

Exhibit 21

A.G. v. Northbrook Industries, Inc. d/b/a United Inn and Suites

Page 255

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

A.G.,

Plaintiff,

Civil Action No.

vs.

1:20-cv-05231-JPB

NORTHBROOK INDUSTRIES, INC.,
d/b/a UNITED INN AND SUITES,
Defendant.

Volume II

G.W.,

Plaintiff,

Civil Action No.

vs.

1:20-cv-05232-JPB

NORTHBROOK INDUSTRIES, INC.,
d/b/a UNITED INN AND SUITES,
Defendant.

J.G.,

Plaintiff,

Civil Action No.

vs.

1:20-cv-05233-SEG

NORTHBROOK INDUSTRIES, INC.,
d/b/a UNITED INN AND SUITES,
Defendant.

CONTINUED VIDEOTAPED 30(B)(6) DEPOSITION OF

NORTHBROOK INDUSTRIES, INC. AND INDIVIDUAL

DEPOSITION OF TAHIR SHAREEF

May 2, 2023 - 1:15 p.m.
1105 West Peachtree Street, NE
Suite 1000
Atlanta, Georgia
J. David Brown, B-1401

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<p style="text-align: right;">Page 257</p> <p>1 Exhibit 14 9/14/2017 Magistrate Court of DeKalb County Notice of Court Appearance 342</p> <p>2</p> <p>3 Exhibit 15 Deferred Sentencing Order with attached check 344</p> <p>4 Exhibit 16 State Court of DeKalb County violations list 346</p> <p>5</p> <p>6 Exhibit 17 email chain between Mr. Shareef and DeKalb County 348</p> <p>7 Exhibit 18 2016 1099 for Rashid Iqbal 350</p> <p>8 Exhibit 19 4/4/2017 email from Mr. Shareef to hnmisail@gmail and saad4649@gmail 352</p> <p>9</p> <p>10 Exhibit 20 2017 1099s for Ms. McMillan and Rashid Iqbal 354</p> <p>11 Exhibit 21 2018 1099 for Ms. McMillan 355</p> <p>12 Exhibit 22 2017 and 2018 1099s for Mr. Sabharwal 358</p> <p>13</p> <p>14 Exhibit 23 4/16/2018 email from Mr. Shareef to Mr. Ismail 359</p> <p>15 Exhibit 24 8/31/2018 pay day spreadsheet 360</p> <p>16 Exhibit 25 5/16/2018 email from Ms. Bold to Mr. Shareef 363</p> <p>17</p> <p>18 Exhibit 26 5/14/2018 email from Mr. Shareef to Bulldog Insurance employees 364</p> <p>19 Exhibit 27 text messages between Mr. Shareef and Sergeant Weber 367</p> <p>20</p> <p>21 Exhibit 28 text messages between Mr. Islam and Sergeant Weber 375</p> <p>22 Exhibit 29 human trafficking articles 381</p> <p>23 Exhibit 30 list of employees at United Inn and Suites for years 2017-2019 395</p> <p>24</p> <p>25 Exhibit 31 email chain between Mr. Shareef and Ms. Laity 397</p>	<p style="text-align: right;">Page 259</p> <p>1 APPEARANCES OF COUNSEL:</p> <p>2 On behalf of the Plaintiffs:</p> <p>3 DAVID H. BOUCHARD, ESQ. Finch McCranie LLP 4 229 Peachtree Street, NE Suite 2500 5 Atlanta, Georgia 30303 404.658.9070</p> <p>6</p> <p>7 On behalf of Defendant in the J.G. case:</p> <p>8 DANA RICHENS, ESQ. Smith, Gambrell & Russell, LLP 9 1105 West Peachtree Street, NE Suite 1000 Atlanta, Georgia 30309 404.815.3500</p> <p>10</p> <p>11 On behalf of Defendant in the A.G. and G.W. cases:</p> <p>12 ERIC UNDERRINER, ESQ. Hall Booth Smith, P.C. 13 2710 Old Milton Parkway Suite 200 14 Alpharetta, Georgia 30009 470.386.6900</p> <p>15</p> <p>16 Also Present:</p> <p>17 BRANDON BRANTLEY, Videographer</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>

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<p style="text-align: right;">Page 260</p> <p>1 PROCEEDINGS</p> <p>2</p> <p>3 THE VIDEOGRAPHER: This will be the video</p> <p>4 deposition of Tahir Shareef individually and as</p> <p>5 30(b)(6) for Northbrook Industries, Inc., being</p> <p>6 taken in the matter of A.G. versus Northbrook</p> <p>7 Industries, Inc. d/b/a United Inn and Suites.</p> <p>8 Today's date is May 2nd, 2023. The time on the</p> <p>9 record is 1:14 p.m. My name is Brandon Brantley.</p> <p>10 I'm the videographer.</p> <p>11 Counsel, please introduce yourselves for</p> <p>12 the record after which the court reporter will</p> <p>13 swear in the witness.</p> <p>14 MR. BOUCHARD: Good afternoon. David</p> <p>15 Bouchard on behalf of Plaintiff A.G., J.G., and</p> <p>16 G.W.</p> <p>17 MS. RICHENS: Dana Richens on behalf of</p> <p>18 Northbrook Industries in the J.G. matter.</p> <p>19 MR. UNDERRINER: Eric Underriner with</p> <p>20 Hall Booth Smith on behalf of Northbrook Industries</p> <p>21 in the G.W. and A.G. matters.</p> <p>22</p> <p>23</p> <p>24</p> <p>25 ///</p>	<p style="text-align: right;">Page 262</p> <p>1 permitted under the Federal Rules of Civil</p> <p>2 Procedure and the Georgia Civil Practice Act</p> <p>3 including, but not limited to, preservation of</p> <p>4 testimony and cross-examination. Is that</p> <p>5 agreeable?</p> <p>6 MS. RICHENS: Yes, it is.</p> <p>7 MR. UNDERRINER: Yes.</p> <p>8 MR. BOUCHARD: As I'd mentioned before we</p> <p>9 went on the record Mr. Court Reporter, because</p> <p>10 there are confidentiality concerns and protective</p> <p>11 orders in effect in these cases, while I will be</p> <p>12 referring to the Plaintiffs by their full names,</p> <p>13 I'd ask that all references to their names today on</p> <p>14 the record be changed to their initials which is</p> <p>15 how the cases are captioned.</p> <p>16 EXAMINATION</p> <p>17 BY MR. BOUCHARD:</p> <p>18 Q Mr. Shareef, we went over this last time,</p> <p>19 but you understand that the hotel that we are going</p> <p>20 to be talking about today is the United Inn and</p> <p>21 Suites at 4649 Memorial Drive, right?</p> <p>22 A Yes.</p> <p>23 Q And so when I refer to the United Inn,</p> <p>24 that's the hotel I'm referring to unless I tell you</p> <p>25 otherwise. Do you understand that?</p>
<p style="text-align: right;">Page 261</p> <p>1 TAHIR SHAREEF</p> <p>2 having been first duly sworn, was examined and</p> <p>3 testified as follows:</p> <p>4 MR. BOUCHARD: Good afternoon,</p> <p>5 Mr. Shareef. As you remember, my name is David</p> <p>6 Bouchard.</p> <p>7 THE WITNESS: Good afternoon.</p> <p>8 MR. BOUCHARD: And I'm a lawyer here in</p> <p>9 Atlanta, Georgia. This deposition that I am going</p> <p>10 to be taking of you today is on behalf of Plaintiff</p> <p>11 A.G. in case number 1:20-cv-05231. The deposition</p> <p>12 today has been cross-noticed in a couple other</p> <p>13 matters as well, specifically case number</p> <p>14 1:20-cv-05232 which is G.W.'s lawsuit and in case</p> <p>15 number 1:20-cv-05233 which is J.G.'s lawsuit.</p> <p>16 Counsel for the Defendants in all three</p> <p>17 cases are present after receiving reasonable</p> <p>18 notice of the depositions. All objections other</p> <p>19 than to the form of a question or to an issue of</p> <p>20 privilege are preserved. Is that agreeable?</p> <p>21 MS. RICHENS: Yes, it is.</p> <p>22 MR. UNDERRINER: Yes.</p> <p>23 MR. BOUCHARD: This deposition is taken</p> <p>24 pursuant to properly served deposition notices and</p> <p>25 cross-notices and it is taken for all purposes</p>	<p style="text-align: right;">Page 263</p> <p>1 A Yes.</p> <p>2 Q And if I refer to the hotel, that's the</p> <p>3 hotel I am referring to unless I tell you</p> <p>4 otherwise. Do you understand that?</p> <p>5 A Yes.</p> <p>6 Q Last time we met we talked about the</p> <p>7 ground rules if you will for a deposition. Do you</p> <p>8 remember that?</p> <p>9 A Yes.</p> <p>10 Q And you remember that obviously like</p> <p>11 there was last time, once again today there's a</p> <p>12 videographer here and a court reporter here?</p> <p>13 A Yes.</p> <p>14 Q And the court reporter is transcribing</p> <p>15 everything we say. Do you understand that?</p> <p>16 A Yes.</p> <p>17 Q That makes it very, very important that I</p> <p>18 let you finish an answer before I start asking</p> <p>19 another question and it also makes it important</p> <p>20 that you wait for me to finish a question before</p> <p>21 you provide an answer. Do you understand that?</p> <p>22 A Yes.</p> <p>23 Q If you at any point are confused by any</p> <p>24 questions that I ask you today, will you please ask</p> <p>25 me to clarify?</p>

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<p style="text-align: right;">Page 264</p> <p>1 A Yes.</p> <p>2 Q If you answer a question that I ask you</p> <p>3 today, I'm going to take that to mean that you</p> <p>4 understood the question. Is that fair?</p> <p>5 A Yes.</p> <p>6 Q Is there any reason whatsoever that you</p> <p>7 can think of, Mr. Shareef, why you cannot provide</p> <p>8 good and accurate and complete testimony today?</p> <p>9 A There's no certain reason.</p> <p>10 Q You're in a position to provide good and</p> <p>11 accurate and complete testimony today?</p> <p>12 A Yes.</p> <p>13 Q You remember of course, Mr. Shareef, that</p> <p>14 you were previously deposed in this case; is that</p> <p>15 correct?</p> <p>16 A Yes.</p> <p>17 Q In February 2023?</p> <p>18 A Yes.</p> <p>19 Q And you understand that we're here today</p> <p>20 reopening and continuing your deposition?</p> <p>21 A Yes.</p> <p>22 Q Both in your individual capacity and also</p> <p>23 in your capacity as the 30(b)(6) representative of</p> <p>24 Northbrook Industries, Inc.?</p> <p>25 A Yes.</p>	<p style="text-align: right;">Page 266</p> <p>1 Mr. Shareef what's been marked as Plaintiff's</p> <p>2 Exhibit 1.</p> <p>3 Mr. Shareef, you see what I have just</p> <p>4 handed you?</p> <p>5 A Yes.</p> <p>6 Q You recognize that as the Notice of</p> <p>7 Videotaped Deposition for Defendant Northbrook</p> <p>8 Industries, Inc.?</p> <p>9 A Yes.</p> <p>10 Q And you see it says 30(b)(6) on the</p> <p>11 caption at the top?</p> <p>12 A Yes.</p> <p>13 Q If you turn to the back of this document,</p> <p>14 Mr. Shareef, specifically the last two pages, which</p> <p>15 are Exhibit A to the document, you should see a</p> <p>16 list of 18 topics. Do you see that?</p> <p>17 A Yes.</p> <p>18 Q Mr. Shareef, have you had an opportunity</p> <p>19 to review these topics prior to today?</p> <p>20 A Yes.</p> <p>21 Q And you understand that it is as to these</p> <p>22 topics that your testimony will be binding on</p> <p>23 Northbrook Industries, Inc.?</p> <p>24 A Yes.</p> <p>25 (Plaintiff's Exhibit 2 marked)</p>
<p style="text-align: right;">Page 265</p> <p>1 Q And you understand that as a corporate</p> <p>2 representative, that means that the answers that</p> <p>3 you provide are on behalf of the corporate entity</p> <p>4 Northbrook Industries; is that right?</p> <p>5 A Yes.</p> <p>6 Q You specifically understand, Mr. Shareef,</p> <p>7 that there were certain topics that we enumerated</p> <p>8 in a 30(b)(6) deposition notice that we served on</p> <p>9 your counsel, right?</p> <p>10 A Yes.</p> <p>11 Q And as to those topics, any testimony</p> <p>12 that you provide today will be binding on the</p> <p>13 corporation Northbrook Industries, Inc. Do you</p> <p>14 understand that?</p> <p>15 A Yes.</p> <p>16 Q Do you understand that one of the reasons</p> <p>17 we needed to reopen and continue your deposition</p> <p>18 today is because new documents were produced after</p> <p>19 your last deposition?</p> <p>20 A New documents produced. Yes. Yes.</p> <p>21 Q You do understand that?</p> <p>22 A Yes.</p> <p>23 (Plaintiff's Exhibit 1 marked)</p> <p>24 BY MR. BOUCHARD:</p> <p>25 Q Let the record reflect I'm showing</p>	<p style="text-align: right;">Page 267</p> <p>1 BY MR. BOUCHARD:</p> <p>2 Q Showing the witness what's been marked as</p> <p>3 Plaintiff's Exhibit 2. And I'll state for the</p> <p>4 record that it might have been clearer and simpler</p> <p>5 to simply pick up from the exhibit numbering from</p> <p>6 your prior deposition. But we'll treat this as new</p> <p>7 exhibit numbering for your reopened and continued</p> <p>8 deposition here.</p> <p>9 Mr. Shareef, I have handed you</p> <p>10 Plaintiff's Exhibit 2 which is Bates stamped</p> <p>11 NBI 002886. Do you see that? You see on the</p> <p>12 bottom right-hand corner, the Bates stamp?</p> <p>13 A Oh, that one. Okay.</p> <p>14 Q Yes, sir.</p> <p>15 A Yes. Yes. Yes.</p> <p>16 Q And this is an April 28th, 2017 letter</p> <p>17 from a Major Padrick with the DeKalb County Police</p> <p>18 Department dated April 28th, 2017. Do you see</p> <p>19 that?</p> <p>20 A Yes.</p> <p>21 Q And it is directed to the United Suites</p> <p>22 at 4649 Memorial Drive, right?</p> <p>23 A Uh-huh (affirmative).</p> <p>24 Q Is that correct?</p> <p>25 A Yes.</p>

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<p style="text-align: right;">Page 268</p> <p>1 Q That's your hotel, right?</p> <p>2 A Right.</p> <p>3 Q And it says here in the first paragraph:</p> <p>4 The DeKalb County Police Department alongside the</p> <p>5 DeKalb County Hotel/Motel Task Force, open paren, a</p> <p>6 program implemented by the DeKalb County CEO's</p> <p>7 Office, close paren, has been tasked with notifying</p> <p>8 various hotels with probable concerns for existing</p> <p>9 and prospective clients. This includes reported</p> <p>10 crimes at several designated locations during the</p> <p>11 first quarter of the year, open paren, January 1,</p> <p>12 2017 through March 31, 2017, the following crimes</p> <p>13 were reported at the United Suites.</p> <p>14 Do you see that, sir?</p> <p>15 A Yes, I do.</p> <p>16 Q You received this letter, Mr. Shareef?</p> <p>17 A I don't recall but I may have.</p> <p>18 Q This letter I can represent to you was</p> <p>19 produced by your lawyers in the cases of J.G., A.G.</p> <p>20 and G.W.</p> <p>21 A Uh-huh (affirmative).</p> <p>22 Q Do you understand that?</p> <p>23 A Yes.</p> <p>24 MS. RICHENS: May I just explain. This</p> <p>25 number here, Mr. Shareef, at the bottom NBI.</p>	<p style="text-align: right;">Page 270</p> <p>1 Q And it has files in it?</p> <p>2 A Yeah. There are, you know, some files</p> <p>3 there.</p> <p>4 Q Are there files related to correspondence</p> <p>5 with DeKalb County?</p> <p>6 A Yes. There was some trespassing reports</p> <p>7 and, you know, those things. And this document,</p> <p>8 you know, may be with those reports. I'm not</p> <p>9 hundred percent sure.</p> <p>10 Q Well, who was responsible at United Inn</p> <p>11 and Suites for collecting documents responsive to</p> <p>12 the discovery request served?</p> <p>13 A I am.</p> <p>14 Q You were responsible?</p> <p>15 A Yes.</p> <p>16 Q So who would have gathered the documents</p> <p>17 and then provided those documents to the lawyers on</p> <p>18 behalf of United Inn and Suites in the J.G., A.G.,</p> <p>19 and G.W. matters?</p> <p>20 A Me.</p> <p>21 Q Did you provide this document to your</p> <p>22 lawyers?</p> <p>23 A I may have, but I don't know 100 percent.</p> <p>24 Q But you're saying there wouldn't have</p> <p>25 been anybody else at United Inn who collected the</p>
<p style="text-align: right;">Page 269</p> <p>1 THE WITNESS: Uh-huh.</p> <p>2 MS. RICHENS: That means that we provided</p> <p>3 it to --</p> <p>4 THE WITNESS: Okay.</p> <p>5 MS. RICHENS: -- Mr. Bouchard.</p> <p>6 THE WITNESS: Okay.</p> <p>7 BY MR. BOUCHARD:</p> <p>8 Q Do you understand that this was provided</p> <p>9 by, produced by your lawyers in the J.G., A.G., and</p> <p>10 G.W. matters?</p> <p>11 A Yes.</p> <p>12 Q Was this a document that you maintained</p> <p>13 at your business premises, that is the United Inn</p> <p>14 and Suites?</p> <p>15 A Yeah, I have seen some of them, yes.</p> <p>16 Q Well, I'm talking about this specific</p> <p>17 document, Plaintiff's Exhibit 2.</p> <p>18 A Uh-huh (affirmative). Yes.</p> <p>19 Q Where was this document kept,</p> <p>20 Mr. Shareef?</p> <p>21 A Where was this kept. I don't know, but</p> <p>22 it must be in my filing cabinet.</p> <p>23 Q Do you have a filing cabinet at the</p> <p>24 hotel?</p> <p>25 A Yeah.</p>	<p style="text-align: right;">Page 271</p> <p>1 documents, it was your job?</p> <p>2 A Yes.</p> <p>3 MS. RICHENS: Excuse me, David, may I ask</p> <p>4 you. And I should know this but I don't. Is this</p> <p>5 a document that was just produced in the</p> <p>6 supplemental production?</p> <p>7 MR. BOUCHARD: Correct. Yeah.</p> <p>8 MS. RICHENS: Would you mind if I took a</p> <p>9 moment to speak with the client. I think it might</p> <p>10 expedite matters.</p> <p>11 MR. BOUCHARD: Sure. We can go off the</p> <p>12 record.</p> <p>13 THE VIDEOGRAPHER: We're off the record</p> <p>14 at 1:26 p.m.</p> <p>15 (A pause was had in the proceedings.)</p> <p>16 THE VIDEOGRAPHER: Back on the record at</p> <p>17 1:28 p.m.</p> <p>18 BY MR. BOUCHARD:</p> <p>19 Q Mr. Shareef, Plaintiff's Exhibit 2, was</p> <p>20 this a document that was maintained in your</p> <p>21 business files at United Inn and Suites?</p> <p>22 A Like I said, there are few documents, you</p> <p>23 know, I gave to them. But again, I was, you know,</p> <p>24 a little confused where did this come from. But I</p> <p>25 can't tell you any specific document, you know,</p>

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<p style="text-align: right;">Page 272</p> <p>1 that is, you know, with me. So that could have 2 been from anywhere. 3 Q I don't understand that answer. Did you 4 find this document on the street or did you find it 5 at the United Inn and Suites? 6 A I don't know. It could have been in the 7 United Suites email. 8 Q So it could have been a document that you 9 found on your business email account? 10 A Yeah. 11 Q It also could have been a hard copy 12 document? 13 A I don't know. That's the reason I was 14 confused. 15 Q Well, you agree with me that it looks 16 like it has been photocopied, you can see some 17 markings in the left-hand side and it is not lined 18 up properly on the page? 19 A Right. 20 Q Do you agree it looks like it was 21 photocopied? 22 A I don't know. 23 Q And there's no email that was produced in 24 this case that contains this document. Are you 25 aware of that?</p>	<p style="text-align: right;">Page 274</p> <p>1 at your property? 2 A I don't know, you know, if I called them, 3 you know, the DeKalb County for any of these 4 crimes, these incident or not. But I don't know. 5 Q You don't remember calling them? 6 A No. 7 Q Is it possible you did not call them? 8 A I don't know. 9 Q The next paragraph says: Please take 10 appropriate security measures to ensure the safety 11 of your patrons. Potential safety measures to 12 implement include, but are not limited to, 13 sufficient lighting, open paren, parking lots, 14 perimeter entrances, stairwells, close paren; 15 property landscaping, open paren, trimming of trees 16 slash bushes around the windows, stairways, walk 17 paths and common areas, close paren; adequate 18 security, open paren, private security, off duty 19 police, rotating days when security present, close 20 paren; proper signage slash surveillance video, 21 open paren, no loitering, unlawful activities not 22 permitted, signage about video surveillance, close 23 paren. 24 Do you see that? 25 A Yes.</p>
<p style="text-align: right;">Page 273</p> <p>1 A Yes. 2 Q So you're saying you just don't know if 3 this was in a hard copy file at your business or 4 not? 5 A That's correct. 6 Q I wanted to ask you about -- well, let me 7 back up a second. You're not disputing that you 8 had this document in your possession though; is 9 that correct? 10 A It could have been in an email. 11 Q There's a list here of crimes that were 12 reported at the United Suites in Plaintiff's 13 Exhibit 2 for the period January 2017 to March 31, 14 2017. One of the crimes listed it says runaway 15 juvenile. Is that familiar to you? 16 A No. 17 Q Do you know what crime that is referring 18 to? 19 A No. 20 Q When you received this notice, did you 21 call the DeKalb County Police Department to 22 inquire? 23 A No. 24 Q Did you have any concerns about there 25 being a reported crime involving a runaway juvenile</p>	<p style="text-align: right;">Page 275</p> <p>1 Q Do you remember reading this letter when 2 you received it, Mr. Shareef? 3 A I don't know. It is so long ago, so I 4 don't know. 5 Q Well, what would be your practice in 2017 6 if you received a letter from the DeKalb County 7 Police Department, would it be important to you? 8 A Yes, it is important. I read them and I 9 see if there is some overgrown bushes or some 10 lighting problem at the parking lot. I always have 11 the signs there no loitering, unlawful activities. 12 I always have those signs. So if somebody knock 13 down the sign, we put it back. 14 Q We discussed in your February deposition 15 that for the years 2017 to 2019, the United Inn had 16 security at the property from the hours of 17 10:00 p.m. to 2:00 a.m. 18 A Yes. 19 Q But not for the other hours -- 20 A Right. 21 Q -- is that correct? 22 A Right. 23 Q In other words, the United Inn for the 24 years in question had security for four hours a day 25 but not for 20 hours a day?</p>

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<p style="text-align: right;">Page 276</p> <p>1 A Right.</p> <p>2 Q And you told me in February that the</p> <p>3 DeKalb County Police Department recommended to you</p> <p>4 and your hotel that you have more security; is that</p> <p>5 correct?</p> <p>6 A I mean they always come in and recommend</p> <p>7 things. But I don't know if they specifically -- I</p> <p>8 mean they if they do see some sign knocked down or</p> <p>9 something, they may have, you know, tell me these</p> <p>10 things.</p> <p>11 Q Well, that's not what I'm talking about.</p> <p>12 I'm not asking you about signs. Last time in</p> <p>13 February when we talked, you said that the police</p> <p>14 came about two to three times a week for the years</p> <p>15 2017 to 2019.</p> <p>16 A Uh-huh (affirmative).</p> <p>17 Q Do you recall that?</p> <p>18 A Yes.</p> <p>19 Q And I asked you, I said Mr. Shareef, you</p> <p>20 know, at some point in time as the owner and</p> <p>21 general manager of the hotel, did you ever go to</p> <p>22 the police and say what can I do to try to prevent</p> <p>23 crime?</p> <p>24 A Uh-huh (affirmative).</p> <p>25 Q Seems like two to three visits a week</p>	<p style="text-align: right;">Page 278</p> <p>1 Q What does that mean?</p> <p>2 A That mean prevent the crimes.</p> <p>3 Q To take action to stop crime from</p> <p>4 happening in the future?</p> <p>5 A Uh-huh (affirmative).</p> <p>6 MR. UNDERRINER: Object to the form.</p> <p>7 BY MR. BOUCHARD:</p> <p>8 Q Well, if you don't understand -- I mean</p> <p>9 is what I just said your understanding of</p> <p>10 prevention or do you have a different</p> <p>11 understanding?</p> <p>12 A No, I have the understanding of</p> <p>13 prevention.</p> <p>14 Q To try to avoid crime from happening in</p> <p>15 the future?</p> <p>16 A Yes.</p> <p>17 Q What do you understand this sentence to</p> <p>18 mean that I just read, the DeKalb County Police</p> <p>19 Department is able and willing to work with you on</p> <p>20 efforts to implement prevention measures at your</p> <p>21 hotel and answer any questions?</p> <p>22 A Yeah, if I have any question and they</p> <p>23 give me this phone number, I could call them.</p> <p>24 Q What about able and willing to work with</p> <p>25 you on efforts to implement prevention measures?</p>
<p style="text-align: right;">Page 277</p> <p>1 from the police is a high volume of visits. And</p> <p>2 you said that one of the things that they</p> <p>3 recommended was hiring more security. Do you</p> <p>4 remember that?</p> <p>5 MS. RICHENS: Objection to the form of</p> <p>6 the question.</p> <p>7 A I don't know.</p> <p>8 BY MR. BOUCHARD:</p> <p>9 Q But you would agree with me that from</p> <p>10 2017 to 2019, you never had security at the</p> <p>11 property outside of 10:00 p.m. to 2:00 a.m.?</p> <p>12 A I don't.</p> <p>13 Q You do not agree or you do agree?</p> <p>14 A I agree that I have security only on</p> <p>15 those times.</p> <p>16 Q The last paragraph for Plaintiff's</p> <p>17 Exhibit 2 says, quote, the DeKalb County Police</p> <p>18 Department is able and willing to work with you on</p> <p>19 efforts to implement prevention measures at your</p> <p>20 hotel and answer any questions.</p> <p>21 Do you see what I just read?</p> <p>22 A Yes.</p> <p>23 Q What do you understand the word</p> <p>24 prevention to mean?</p> <p>25 A Prevent the crime.</p>	<p style="text-align: right;">Page 279</p> <p>1 A Meaning that, you know, if they need to,</p> <p>2 you know, talk to me and maybe suggest something.</p> <p>3 Q Did you ever ask them to work with you on</p> <p>4 efforts to implement prevention measures?</p> <p>5 A No. I have these officer, they are from</p> <p>6 the same department. I talk with them all the</p> <p>7 time. They work for me. They come every night.</p> <p>8 So those are the, you know, question I tell them,</p> <p>9 you know, that we need to -- what we can do. And</p> <p>10 they always, you know, suggested that, you know, we</p> <p>11 have a problem, call 911, call the cops.</p> <p>12 Q Other than Weber and McClelland who I</p> <p>13 believe you're referring to right now.</p> <p>14 A Yes.</p> <p>15 Q Did you ever ask the DeKalb County Police</p> <p>16 Department to work with you on efforts to implement</p> <p>17 prevention measures at the hotel?</p> <p>18 A I don't know.</p> <p>19 Q Well, you understand that you're the</p> <p>20 30(b)(6) representative for Northbrook Industries,</p> <p>21 Inc. on the topic of, among others, security at the</p> <p>22 property. This is my only opportunity before</p> <p>23 trial, Mr. Shareef, to understand what security</p> <p>24 measures for example the hotel had in effect during</p> <p>25 the relevant period. Do you understand that?</p>

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<p style="text-align: right;">Page 280</p> <p>1 A Yes.</p> <p>2 Q Are you prepared to testify today?</p> <p>3 A I am.</p> <p>4 Q Did the hotel or did not the hotel take</p> <p>5 on the DeKalb County Police Department's request</p> <p>6 and offer -- let me strike that and ask it again.</p> <p>7 At any point in time did the United Inn</p> <p>8 and Suites ask the DeKalb County Police Department</p> <p>9 to work with it on efforts to implement prevention</p> <p>10 measures at the hotel?</p> <p>11 A Like I said, I talked to the Sergeant</p> <p>12 Weber and Sergeant McClelland, so they are the</p> <p>13 representative, you know, from the Police</p> <p>14 Department, same department which you asked me, you</p> <p>15 know, what I have done. So this is my main source,</p> <p>16 so I always seek help from them.</p> <p>17 Q Other than them, the answer is no?</p> <p>18 A That's right.</p> <p>19 Q And they were working in an off-duty</p> <p>20 capacity from 10:00 p.m. to 2:00 a.m.?</p> <p>21 A Yes.</p> <p>22 Q The rest of the day they were not working</p> <p>23 at the property, they were working for the DeKalb</p> <p>24 County Police Department or they were at home or</p> <p>25 doing something else, right?</p>	<p style="text-align: right;">Page 282</p> <p>1 Department to do a security assessment of your</p> <p>2 property?</p> <p>3 A No.</p> <p>4 Q Did you ever ask the DeKalb County Police</p> <p>5 Department to do an assessment of measures you</p> <p>6 could put in effect to reduce crime on the</p> <p>7 property?</p> <p>8 A Again, my source is those police officer.</p> <p>9 They are there and I meet them almost nightly</p> <p>10 basis. So I ask them, you know, if there's</p> <p>11 anything -- if there's any question, so I might</p> <p>12 have asked them. I don't know. This is 2017.</p> <p>13 Q This letter didn't come from Weber or</p> <p>14 McClelland, correct?</p> <p>15 A Uh-huh (affirmative).</p> <p>16 Q Is that right?</p> <p>17 A Yes.</p> <p>18 Q It came from a Major Padrick, right?</p> <p>19 A Okay. Yes.</p> <p>20 Q And McClelland and Weber were working at</p> <p>21 the United Inn in an off-duty capacity four hours</p> <p>22 per day prior to this letter being sent to you,</p> <p>23 right?</p> <p>24 A Yes.</p> <p>25 Q Did the United Inn take any action based</p>
<p style="text-align: right;">Page 281</p> <p>1 MR. UNDERRINER: Object to form.</p> <p>2 A Maybe.</p> <p>3 BY MR. BOUCHARD:</p> <p>4 Q I mean did they work at your hotel the</p> <p>5 other 20 hours per day?</p> <p>6 A No.</p> <p>7 Q And have you produced all the text</p> <p>8 messages in this case that you have from the years</p> <p>9 2017 to '19 with Weber and/or McClelland?</p> <p>10 A I guess so.</p> <p>11 Q So when you say you were communicating</p> <p>12 with them all the time, that would be reflected in</p> <p>13 the text messages you produced?</p> <p>14 A Yes.</p> <p>15 Q Did you ever ask the DeKalb County Police</p> <p>16 Department to help train your staff on sex</p> <p>17 trafficking?</p> <p>18 A Did I ever ask. No.</p> <p>19 Q Or on commercial sex activity?</p> <p>20 A No.</p> <p>21 Q Did you ever ask the DeKalb County Police</p> <p>22 Department to train your staff on indicators of</p> <p>23 crime?</p> <p>24 A Did I ask them. No.</p> <p>25 Q Did you ever ask the DeKalb County Police</p>	<p style="text-align: right;">Page 283</p> <p>1 on this letter, Plaintiff's Exhibit 2?</p> <p>2 A We might have. Like I told you, whatever</p> <p>3 we think is appropriate to help, we do it.</p> <p>4 Q What I'm asking is in response to your</p> <p>5 receiving Plaintiff's Exhibit 2, did the hotel</p> <p>6 implement some new security measure?</p> <p>7 A Some new security measure. I don't know.</p> <p>8 I think that's -- I don't know but we might have.</p> <p>9 I don't know.</p> <p>10 Q Did the hotel continue doing what it had</p> <p>11 always done as it relates to security after it</p> <p>12 received Plaintiff's Exhibit 2?</p> <p>13 MR. UNDERRINER: Object to the form.</p> <p>14 A Can you repeat the question.</p> <p>15 BY MR. BOUCHARD:</p> <p>16 Q Yeah. You told me that Weber and</p> <p>17 McClelland were working four hours per day --</p> <p>18 A Uh-huh (affirmative).</p> <p>19 Q -- prior to receipt of this letter in</p> <p>20 2017, right?</p> <p>21 A Yes.</p> <p>22 Q After you received this letter, that is</p> <p>23 Plaintiff's Exhibit 2, did you ask Weber or</p> <p>24 McClelland to start working more hours per day?</p> <p>25 A No.</p>

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<p style="text-align: right;">Page 284</p> <p>1 Q Did you ask other security to come in and</p> <p>2 start working other hours during the day?</p> <p>3 A No.</p> <p>4 Q Did you implement any other new security</p> <p>5 measures after receiving Plaintiff's Exhibit 2</p> <p>6 based on Plaintiff's Exhibit 2?</p> <p>7 A No.</p> <p>8 Q So as the owner of the hotel, it is not</p> <p>9 like you got Plaintiff's Exhibit 2 and you said</p> <p>10 wow, I am going to implement some new security</p> <p>11 measures based on what I am reading here?</p> <p>12 MR. UNDERRINER: Object to the form.</p> <p>13 BY MR. BOUCHARD:</p> <p>14 Q I didn't hear your answer, sir.</p> <p>15 A I don't know how to answer it. But</p> <p>16 again, you know, I pass whatever information to my</p> <p>17 officers, and that's my best source because they</p> <p>18 working on the same department and they are very,</p> <p>19 you know, qualified people.</p> <p>20 (Plaintiff's Exhibit 3 marked)</p> <p>21 BY MR. BOUCHARD:</p> <p>22 Q I'm showing the witness Plaintiff's</p> <p>23 Exhibit 3 which is Bates stamped NBI 03765 and</p> <p>24 NBI 03766 through NBI 03774.</p> <p>25 Mr. Shareef, I have handed you what's</p>	<p style="text-align: right;">Page 286</p> <p>1 produced in this case?</p> <p>2 A The documents, you got it from your --</p> <p>3 from my United Inn email. You know, that's a long</p> <p>4 time ago. I did not, you know, read, you know,</p> <p>5 lately what is there.</p> <p>6 Q No. I'm talking about documents that</p> <p>7 were produced for the first time last week. Have</p> <p>8 you read these documents, Mr. Shareef?</p> <p>9 A From the emails? What is the question?</p> <p>10 Which documents you are -- I don't know.</p> <p>11 Q The whole reason that we're here today is</p> <p>12 because there were documents produced after you</p> <p>13 were deposed in February.</p> <p>14 A Okay.</p> <p>15 Q Do you understand that?</p> <p>16 A Yes.</p> <p>17 Q In fact, those documents were produced</p> <p>18 last week. Do you understand that?</p> <p>19 A Via email. Via ...</p> <p>20 Q The documents were provided from your</p> <p>21 lawyer to me last week. Do you understand that?</p> <p>22 A Yes.</p> <p>23 Q Have you reviewed those documents in</p> <p>24 connection with getting ready for your deposition</p> <p>25 today, Mr. Shareef?</p>
<p style="text-align: right;">Page 285</p> <p>1 been marked as Plaintiff's Exhibit 3 which is an</p> <p>2 email and the attachment to the email. Do you see</p> <p>3 that?</p> <p>4 A Yes.</p> <p>5 Q And it is an email from Chief Sumlin to</p> <p>6 the hotel's email account at Gmail. Do you see</p> <p>7 that?</p> <p>8 A Yes.</p> <p>9 Q Dated November 14th, 2017; is that right?</p> <p>10 A Yes.</p> <p>11 Q And this is about seven months after the</p> <p>12 date on Plaintiff's Exhibit 2, that letter we were</p> <p>13 just looking at from the DeKalb County Police</p> <p>14 Department; is that right?</p> <p>15 A Yes.</p> <p>16 Q Are you familiar with this email and the</p> <p>17 Proposal for Security Services attached to it?</p> <p>18 A Yes, I have seen it.</p> <p>19 Q You're familiar with it?</p> <p>20 A I may have seen this one that time. I</p> <p>21 may have talked to him. I don't know.</p> <p>22 Q Did you review any documents to prepare</p> <p>23 for your deposition today?</p> <p>24 A No, I did not.</p> <p>25 Q Have you reviewed the documents that you</p>	<p style="text-align: right;">Page 287</p> <p>1 A I have seen some. But I don't know, what</p> <p>2 is -- how many of them you get it via email?</p> <p>3 THE WITNESS: Is that that email we</p> <p>4 talking about here? Which document he's</p> <p>5 concerning?</p> <p>6 MS. RICHENS: You received this by email.</p> <p>7 THE WITNESS: Email. Yeah.</p> <p>8 MS. RICHENS: He's asking if you remember</p> <p>9 receiving it?</p> <p>10 BY MR. BOUCHARD:</p> <p>11 Q Well, actually that's not what I'm</p> <p>12 asking.</p> <p>13 A Okay.</p> <p>14 Q I'm asking if you have reviewed the</p> <p>15 documents that your lawyers produced to me last</p> <p>16 week in this case?</p> <p>17 A No.</p> <p>18 Q You did not?</p> <p>19 A No.</p> <p>20 Q But you're prepared to give testimony</p> <p>21 today on behalf of the corporation?</p> <p>22 A But I don't know that this the document,</p> <p>23 you know, I'll see and I have to remember, you</p> <p>24 know, what happened in 2017.</p> <p>25 Q Well, I'm not asking you to remember</p>

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<p style="text-align: right;">Page 288</p> <p>1 something in 2017 right now. I'm asking if you</p> <p>2 reviewed this last week after it was produced?</p> <p>3 A I did not reviewed this.</p> <p>4 Q And you're saying you have not reviewed</p> <p>5 any of the documents in the last week?</p> <p>6 A No, I did not review this.</p> <p>7 Q Have you reviewed any other documents in</p> <p>8 the last week in this case or these cases?</p> <p>9 A I may have. But I don't know what we</p> <p>10 talked about.</p> <p>11 Q Have you met with your lawyers prior to</p> <p>12 today's case -- prior to today's deposition?</p> <p>13 A Lawyer, no. We had, you know, phone</p> <p>14 conversation.</p> <p>15 Q Were documents discussed on that phone</p> <p>16 conversation?</p> <p>17 A The deposition, you know, is going to</p> <p>18 come and --</p> <p>19 MS. RICHENS: Let me stop you. I don't</p> <p>20 want you giving any further communication about</p> <p>21 what we talked about.</p> <p>22 BY MR. BOUCHARD:</p> <p>23 Q I don't need to know and I don't want to</p> <p>24 know what you discussed with your lawyers. I'm</p> <p>25 really only asking did you review documents --</p>	<p style="text-align: right;">Page 290</p> <p>1 A Yes.</p> <p>2 Q Do you think Ashar did the same or were</p> <p>3 you the one --</p> <p>4 A No --</p> <p>5 Q -- responsible for that?</p> <p>6 A -- I'm the one.</p> <p>7 Q You were the one?</p> <p>8 A Yeah.</p> <p>9 Q Why did you do that?</p> <p>10 A Trying to find what their services are</p> <p>11 and how much it cost.</p> <p>12 Q Why would you be asking for proposals</p> <p>13 from other security providers if you already had</p> <p>14 Weber and McClelland?</p> <p>15 A Because I want to see if I can, you know,</p> <p>16 have the non-police officer security people working</p> <p>17 maybe few more hours there.</p> <p>18 Q What does that mean?</p> <p>19 A Meaning that, you know, if they give me</p> <p>20 proposal, I may have, you know, take their</p> <p>21 services.</p> <p>22 Q Why were you interested in security</p> <p>23 proposals about security for a few more hours</p> <p>24 there, as you say, at the hotel?</p> <p>25 A Why I am interested. Just like if the</p>
<p style="text-align: right;">Page 289</p> <p>1 A Not this --</p> <p>2 Q -- as part of --</p> <p>3 A Not this --</p> <p>4 Q -- your discussion?</p> <p>5 A -- document.</p> <p>6 Q Do you know who Chief Sumlin is,</p> <p>7 Mr. Shareef?</p> <p>8 A No.</p> <p>9 Q Have you ever spoken to him?</p> <p>10 A No.</p> <p>11 Q Do you know why he sent you this Proposal</p> <p>12 for Security Services?</p> <p>13 A I don't know why he send it to me. I</p> <p>14 don't know. Maybe at that time we send a bunch of</p> <p>15 email to people to have some kind of proposal and</p> <p>16 this may be one of them.</p> <p>17 Q You just said maybe at that time we sent</p> <p>18 a bunch of email to people requesting proposal.</p> <p>19 Are you saying you did send emails requesting</p> <p>20 proposals?</p> <p>21 A Email, phone calls, I don't know what</p> <p>22 happened 2017.</p> <p>23 Q Do you believe that in 2017 you asked</p> <p>24 other security providers to prepare proposals for</p> <p>25 the United Inn and Suites?</p>	<p style="text-align: right;">Page 291</p> <p>1 camera is broken, you know, we change it or add it,</p> <p>2 you know. Same way, we get the proposal and see if</p> <p>3 it is doable.</p> <p>4 Q I don't think that answers the question</p> <p>5 I'm asking. Why were you reaching out for more</p> <p>6 security proposals? I mean you had Weber and</p> <p>7 McClelland.</p> <p>8 A Right.</p> <p>9 Q Why are you contacting other companies?</p> <p>10 A I mean it is all right to check, you</p> <p>11 know, their pricing and stuff, you know, and their</p> <p>12 services.</p> <p>13 Q You were shopping for other security?</p> <p>14 A Yeah.</p> <p>15 Q Were you dissatisfied with Weber or</p> <p>16 McClelland?</p> <p>17 A No. No. I did not say dissatisfy. I</p> <p>18 just, you know, maybe I can add more hour when they</p> <p>19 are not available.</p> <p>20 Q And they were only available from</p> <p>21 10:00 p.m. to 2:00 a.m.?</p> <p>22 A Yes.</p> <p>23 Q So you were shopping for other security</p> <p>24 services that may be available other hours of the</p> <p>25 day?</p>

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<p style="text-align: right;">Page 292</p> <p>1 A Yes.</p> <p>2 Q Do you agree with me that it looks like,</p> <p>3 according to Plaintiff's Exhibit 3, Brown</p> <p>4 Protective Services would have been available 24</p> <p>5 hours a day?</p> <p>6 A Yes.</p> <p>7 Q Did you receive proposals from any other</p> <p>8 security service providers that would have provided</p> <p>9 you with 24-hour security at the hotel?</p> <p>10 A I don't know.</p> <p>11 MR. UNDERRINER: Object to the form.</p> <p>12 BY MR. BOUCHARD:</p> <p>13 Q You don't recall?</p> <p>14 A I don't know.</p> <p>15 Q Well, do you believe that you received</p> <p>16 other proposals like this one around that time in</p> <p>17 2017 when you were shopping?</p> <p>18 A I don't know.</p> <p>19 Q Well, you have testified earlier today</p> <p>20 that in 2017 you reached out and requested</p> <p>21 proposals either by email or phone from other</p> <p>22 security providers, right?</p> <p>23 A Yes.</p> <p>24 Q Do you think Brown Protective Services</p> <p>25 was the only service provider that you reached out</p>	<p style="text-align: right;">Page 294</p> <p>1 Q And you do not recall why?</p> <p>2 A I don't know.</p> <p>3 Q And you didn't decide in November 2017 or</p> <p>4 thereafter to hire any other private security</p> <p>5 company to provide additional security at the</p> <p>6 property; is that correct?</p> <p>7 A I may have. I don't know.</p> <p>8 Q Well, I think the answer is no. But let</p> <p>9 me ask again.</p> <p>10 A Uh-huh (affirmative).</p> <p>11 Q Between 2017 and 2019, other than Weber</p> <p>12 and McClelland, did you at any time have any other</p> <p>13 private security at the hotel?</p> <p>14 A No.</p> <p>15 Q So you've never hired another private</p> <p>16 security company?</p> <p>17 A No.</p> <p>18 Q Correct?</p> <p>19 A That's right.</p> <p>20 Q So we don't know if you got any other</p> <p>21 proposals other than this proposal in Plaintiff's 3</p> <p>22 from Brown Protective Services. But regardless,</p> <p>23 you didn't hire anybody else, right?</p> <p>24 A Right.</p> <p>25 Q And what I don't understand is why you</p>
<p style="text-align: right;">Page 293</p> <p>1 to or do you think there were others?</p> <p>2 A Maybe. I don't know. Maybe there are</p> <p>3 other.</p> <p>4 Q Do you think there were or do you not</p> <p>5 think there were?</p> <p>6 A I don't know.</p> <p>7 Q But you're the only person who would know</p> <p>8 that, right, Mr. Shareef?</p> <p>9 A Right.</p> <p>10 Q And your testimony is I just don't know?</p> <p>11 A I mean yeah, I don't know. That's the</p> <p>12 best I can remember.</p> <p>13 Q Where did you get the name Brown</p> <p>14 Protective Services from?</p> <p>15 A Maybe he left a card there. He left a</p> <p>16 business card there. I don't know how, you know, I</p> <p>17 had contact with him.</p> <p>18 Q Why did you not hire them?</p> <p>19 A For maybe any reason. I don't know. I</p> <p>20 don't even recall, you know, what the conversation</p> <p>21 was with him. But I don't have the answer.</p> <p>22 Q You received this proposal in</p> <p>23 November 2017, but you decided not to hire Brown</p> <p>24 Protective Services?</p> <p>25 A Yes.</p>	<p style="text-align: right;">Page 295</p> <p>1 didn't hire more security?</p> <p>2 A There could be their timing issue or my</p> <p>3 timing issue or some other -- I don't know.</p> <p>4 (Plaintiff's Exhibit 4 marked)</p> <p>5 BY MR. BOUCHARD:</p> <p>6 Q Mr. Shareef, I'm handing you what's been</p> <p>7 marked as Plaintiff's Exhibit 4. And Plaintiff's</p> <p>8 Exhibit 4 is Bates stamped NBI 2566 to 67.</p> <p>9 Mr. Shareef, page 1 of Plaintiff's Exhibit 4 is a</p> <p>10 Business Record Certification in the United States</p> <p>11 District Court for the Northern District of Georgia</p> <p>12 and the second page of Plaintiff's Exhibit 4 is a</p> <p>13 Waiver of Appearance and Document Receipt. Do you</p> <p>14 see that?</p> <p>15 A Yes.</p> <p>16 Q The second page of Plaintiff's Exhibit 4</p> <p>17 is captioned Northern District of Georgia, In Re:</p> <p>18 Grand Jury Proceedings, the second page. Do you</p> <p>19 see that at the top of the document?</p> <p>20 A Yes.</p> <p>21 Q Did United Inn and Suites receive a</p> <p>22 federal grand jury subpoena in 2017?</p> <p>23 A Are you talking about this one?</p> <p>24 Q I'm asking did United Inn and Suites</p> <p>25 receive a federal grand jury subpoena in 2017?</p>

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<p style="text-align: right;">Page 296</p> <p>1 Don't worry about what you're holding right now.</p> <p>2 A Well, if you talking about this document,</p> <p>3 I could say yes.</p> <p>4 Q Do you remember receiving a subpoena in</p> <p>5 2017 asking the hotel to produce records?</p> <p>6 A I don't know. If I don't see this paper,</p> <p>7 I don't even know what you're talking about. But I</p> <p>8 have this paper in front of me.</p> <p>9 Q Mr. Shareef, has the FBI ever visited</p> <p>10 United Inn and Suites?</p> <p>11 A Yes.</p> <p>12 Q I imagine that would be memorable, right?</p> <p>13 A Yes.</p> <p>14 Q When did that occur?</p> <p>15 A I don't know.</p> <p>16 Q Was that about 2017?</p> <p>17 A I don't know.</p> <p>18 (Plaintiff's Exhibit 5 marked)</p> <p>19 BY MR. BOUCHARD:</p> <p>20 Q I'm showing you Plaintiff's Exhibit 5</p> <p>21 which is Bates stamped NBI 2554. Mr. Shareef,</p> <p>22 Plaintiff's Exhibit 5 is an email chain between you</p> <p>23 and Kelly J. Strickler who's an FBI agent, and the</p> <p>24 email chain is from August 2017. Do you see that?</p> <p>25 A Yes.</p>	<p style="text-align: right;">Page 298</p> <p>1 FBI visiting the hotel, Mr. Shareef.</p> <p>2 A I have no idea when they visit what is</p> <p>3 the -- what is even the question. I don't</p> <p>4 remember.</p> <p>5 Q Mr. Shareef, I have asked you do you</p> <p>6 recall the FBI visiting the hotel and you said yes.</p> <p>7 A Uh-huh (affirmative). Yes.</p> <p>8 Q What do you recall about that?</p> <p>9 A I can't recall nothing.</p> <p>10 Q Except you recall them visiting?</p> <p>11 A Yeah.</p> <p>12 Q Who did they talk to?</p> <p>13 A They must have talked to me.</p> <p>14 Q Do you recall them talking to anybody</p> <p>15 else?</p> <p>16 A I don't know.</p> <p>17 Q Where did they talk to you?</p> <p>18 A At the front desk.</p> <p>19 Q How long was the conversation?</p> <p>20 A I have no idea.</p> <p>21 Q Was it hours long? Was it minutes long?</p> <p>22 A Could be a minute. Could be an hour. I</p> <p>23 don't know.</p> <p>24 Q Were you sitting or standing for the</p> <p>25 conversation?</p>
<p style="text-align: right;">Page 297</p> <p>1 Q Do you recall this exchange over email</p> <p>2 with Agent Strickler?</p> <p>3 A Looking at the document, yes, I can.</p> <p>4 Q Do you recall that you received a</p> <p>5 subpoena from the FBI requesting that the hotel</p> <p>6 produce records in August of 2017?</p> <p>7 A Yes.</p> <p>8 Q How did you get the subpoena?</p> <p>9 A How did we get the subpoena. Someone</p> <p>10 came and give it to us I think. I don't know.</p> <p>11 Q Somebody from the FBI came to the hotel?</p> <p>12 A Could be.</p> <p>13 Q You said that you remember the FBI</p> <p>14 visiting the hotel.</p> <p>15 A Yes.</p> <p>16 Q You couldn't remember when that was.</p> <p>17 A No.</p> <p>18 Q How many times did the FBI visit the</p> <p>19 hotel?</p> <p>20 A I don't know.</p> <p>21 Q More than once?</p> <p>22 A Maybe. I don't know.</p> <p>23 Q More than five times?</p> <p>24 A I don't know. I have no idea.</p> <p>25 Q Well, tell me what you remember about the</p>	<p style="text-align: right;">Page 299</p> <p>1 A Usually standing.</p> <p>2 Q Was there anybody else present?</p> <p>3 A I don't know.</p> <p>4 Q Do you know if they talked to anybody</p> <p>5 else on the property?</p> <p>6 A I don't know.</p> <p>7 Q Do you know what they did on the property</p> <p>8 other than speak to you?</p> <p>9 A I don't know.</p> <p>10 Q So you just have no clear recollection of</p> <p>11 the FBI visiting the United Inn and Suites?</p> <p>12 A No.</p> <p>13 Q Is that not a memorable event to you?</p> <p>14 A Not really. If they come and they have</p> <p>15 check a room, if they ask me something, they ask me</p> <p>16 the name of the guest or something, I give them a</p> <p>17 report and that's usually end of it. I don't know</p> <p>18 what they asked me. I don't remember.</p> <p>19 Q Did you understand what they were</p> <p>20 investigating?</p> <p>21 A No.</p> <p>22 Q Did you ask?</p> <p>23 A I must have.</p> <p>24 Q Did they answer you?</p> <p>25 A They must have answered me. But I don't</p>

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<p style="text-align: right;">Page 300</p> <p>1 know what they investigating and what is the answer</p> <p>2 from them.</p> <p>3 Q When did you learn that the FBI was</p> <p>4 investigating minor sex trafficking at the United</p> <p>5 Inn and Suites?</p> <p>6 MS. RICHENS: I'm going to object to the</p> <p>7 form of the question.</p> <p>8 A I don't know. I don't know the answer.</p> <p>9 BY MR. BOUCHARD:</p> <p>10 Q Again, Mr. Shareef, this is the only</p> <p>11 opportunity I have to get answers to some very</p> <p>12 basic questions relevant to the Plaintiffs' claims</p> <p>13 in their respective cases prior to trial.</p> <p>14 A Right.</p> <p>15 Q Your testimony is you have zero</p> <p>16 recollection of when you learned that the FBI was</p> <p>17 investigating minor sex trafficking at the United</p> <p>18 Inn and Suites?</p> <p>19 MS. RICHENS: Objection as to form.</p> <p>20 A They came and, like I said, they asked me</p> <p>21 if I have any record. Or sometime they ask me if</p> <p>22 they can go to any room, and I help them open the</p> <p>23 room sometime. But I don't know in that specific</p> <p>24 case I have no recollection.</p> <p>25</p>	<p style="text-align: right;">Page 302</p> <p>1 testimony.</p> <p>2 BY MR. BOUCHARD:</p> <p>3 Q Well, Mr. Shareef, is it your testimony</p> <p>4 that they asked you to take them to a room at the</p> <p>5 hotel?</p> <p>6 A I mean police asked them, you know, to</p> <p>7 take to the room. And FBI, police, same thing for</p> <p>8 me. I am not getting your question. For me</p> <p>9 anybody comes in, you know, the police officer, the</p> <p>10 FBI, that comes in a uniform, for me the same, they</p> <p>11 are the authority and they ask me any information.</p> <p>12 If I have it, I produce them. If I don't have it,</p> <p>13 I tell them look, I don't have it.</p> <p>14 I'm going to give you example. Sometimes</p> <p>15 they come and say okay, I need to know if this</p> <p>16 person is staying with us. We look at the record.</p> <p>17 And sometimes they show us a picture. And if there</p> <p>18 is somebody in there, in the record, we give them</p> <p>19 the information. But, you know, maybe sometimes we</p> <p>20 said we have no record, we don't know, nobody</p> <p>21 recognize this face.</p> <p>22 Q I'm asking you specifically about the FBI</p> <p>23 visit that's referenced in Plaintiff's Exhibit 5</p> <p>24 because it is pertinent to this case.</p> <p>25 A Okay.</p>
<p style="text-align: right;">Page 301</p> <p>1 BY MR. BOUCHARD:</p> <p>2 Q But you just recalled something that I'd</p> <p>3 asked you about previously. You said that they</p> <p>4 asked you to show you a room.</p> <p>5 A Yeah.</p> <p>6 Q You understand that you're under oath</p> <p>7 today, sir?</p> <p>8 A Yes. Yes. Yes.</p> <p>9 Q And so when I ask you a question, you're</p> <p>10 obligated to give a full and complete answer to it.</p> <p>11 A Yeah. But I don't know the timing. And</p> <p>12 I don't even know the questions after so many</p> <p>13 years. So if I don't know, I don't know.</p> <p>14 Q Well, I asked you what you remembered</p> <p>15 about their visit.</p> <p>16 A Right.</p> <p>17 Q And you're now telling me that you</p> <p>18 remember that they asked you to take them to a</p> <p>19 room.</p> <p>20 A Yes.</p> <p>21 Q Is that correct?</p> <p>22 MS. RICHENS: I'm going to object --</p> <p>23 A May have.</p> <p>24 MS. RICHENS: -- to the form of the</p> <p>25 question. I think it misstates his prior</p>	<p style="text-align: right;">Page 303</p> <p>1 Q And so that's why I'm focusing on that</p> <p>2 specific visit and this specific grand jury</p> <p>3 subpoena that I have asked you about. If you don't</p> <p>4 have any recollection of the FBI coming, that's</p> <p>5 fine. But it sounds like you do have some</p> <p>6 recollection. So that's what I'm trying to</p> <p>7 understand, what is your recollection of the FBI</p> <p>8 coming in 2017?</p> <p>9 A Okay. Like I said, police officer, FBI,</p> <p>10 whoever come, they ask anything, we provide them.</p> <p>11 And after that, you know, I don't know what they do</p> <p>12 with that information.</p> <p>13 Q So you believe you provided to the FBI</p> <p>14 whatever the FBI asked for; is that what you're</p> <p>15 saying?</p> <p>16 A That's right.</p> <p>17 Q And you may have taken the FBI agent or</p> <p>18 agents to a room at the hotel?</p> <p>19 A If they asked for it, yes.</p> <p>20 Q But you cannot recall if they did?</p> <p>21 A No.</p> <p>22 Q And I'm going to ask you again, is there</p> <p>23 anything else that you can remember about your</p> <p>24 interactions with the FBI agents in 2017 that you</p> <p>25 have not already told me?</p>

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<p style="text-align: right;">Page 304</p> <p>1 A No, I don't know. I don't have ...</p> <p>2 (Plaintiff's Exhibit 6 marked)</p> <p>3 BY MR. BOUCHARD:</p> <p>4 Q I'm showing you Plaintiff's Exhibit 6</p> <p>5 which is one of the documents that you provided to</p> <p>6 the FBI in 2017, and it is Bates stamped NBI 2568</p> <p>7 through NBI 2572. You see that, Mr. Shareef?</p> <p>8 A Yes.</p> <p>9 Q Do you recall preparing this report for</p> <p>10 the FBI?</p> <p>11 A I mean looking at these documents, this</p> <p>12 come from my record that time. So other than that,</p> <p>13 I don't recall anything.</p> <p>14 Q Well, I can represent to you,</p> <p>15 Mr. Shareef, that this document, NBI 2568, on</p> <p>16 page 1 of Plaintiff's Exhibit 6 lists for example</p> <p>17 Kikia S. Anderson in row number 5 there who has</p> <p>18 pled guilty to sex trafficking A.G. and G.W. Are</p> <p>19 you aware of that?</p> <p>20 A No.</p> <p>21 Q Do you recall preparing this report for</p> <p>22 the FBI?</p> <p>23 A This one? Yes.</p> <p>24 Q You do recall preparing it?</p> <p>25 A I mean if we print it, yes.</p>	<p style="text-align: right;">Page 306</p> <p>1 Q Is that true?</p> <p>2 A Yes.</p> <p>3 Q The United Inn and Suites is an extended</p> <p>4 stay hotel?</p> <p>5 A That's right.</p> <p>6 Q How does the United Inn and Suites comply</p> <p>7 with the DeKalb County ordinance prohibiting stays</p> <p>8 consecutive of 180 days or more?</p> <p>9 MS. RICHENS: Objection, calls for legal</p> <p>10 conclusion.</p> <p>11 A I don't know. But I am trying to take</p> <p>12 few of the same reason few people out from the</p> <p>13 property, and I just cannot do it because I don't</p> <p>14 get any help to evict them. They said they don't</p> <p>15 want to move. And even right now there are two</p> <p>16 people, I take them to the court, I still cannot</p> <p>17 remove them.</p> <p>18 BY MR. BOUCHARD:</p> <p>19 Q Even though you were having difficulty</p> <p>20 removing people from the property, you didn't hire</p> <p>21 more security from 2017 to 2019?</p> <p>22 MR. UNDERRINER: Object to the form.</p> <p>23 A I call police, they cannot remove it. I</p> <p>24 call security, can't move them. I call the actual</p> <p>25 police, they cannot move it.</p>
<p style="text-align: right;">Page 305</p> <p>1 Q Is this a report that's sitting here in</p> <p>2 2023 you could prepare for the same time period all</p> <p>3 over again?</p> <p>4 A I don't think so. It goes maybe a month,</p> <p>5 two months, something, whatever system has the</p> <p>6 capacity.</p> <p>7 Q So if you sat down at your computer in</p> <p>8 2023 and tried to prepare a report from 2017, you</p> <p>9 wouldn't be able to do it?</p> <p>10 A No.</p> <p>11 Q Because this data is no longer available</p> <p>12 on your business computer?</p> <p>13 A That's what I'm guessing.</p> <p>14 Q Have you tried to prepare such a report</p> <p>15 for data from years prior?</p> <p>16 A Yes, I guess.</p> <p>17 Q Were you able to do so?</p> <p>18 A I cannot be able to do it.</p> <p>19 Q I noticed that the column that stands for</p> <p>20 LOS is length of stay. Do you see that?</p> <p>21 A Yes.</p> <p>22 Q And some of the guests at the hotel, if</p> <p>23 you scroll through Plaintiff's Exhibit 6, literally</p> <p>24 stayed at the hotel for thousands of days.</p> <p>25 A Yeah.</p>	<p style="text-align: right;">Page 307</p> <p>1 BY MR. BOUCHARD:</p> <p>2 Q You didn't hire more security in 2017 to</p> <p>3 2019 to try to help you move people off the</p> <p>4 property?</p> <p>5 A I have a police, they cannot remove it.</p> <p>6 Q I don't understand what you mean.</p> <p>7 A I mean the police, the real police</p> <p>8 officer with the authority, they cannot remove</p> <p>9 them. The security person, certainly they cannot</p> <p>10 remove them.</p> <p>11 Q What's your basis for saying that,</p> <p>12 Mr. Shareef?</p> <p>13 A Because I have tried, you know, many</p> <p>14 times, you know, few of the people, they are living</p> <p>15 there longer time. I tried to, you know, seek help</p> <p>16 from the police, from the court. I still cannot do</p> <p>17 it.</p> <p>18 Q When you prepared Plaintiff's Exhibit 6</p> <p>19 for FBI Agent Strickland in 2017, did you</p> <p>20 understand why she wanted you to prepare this</p> <p>21 report?</p> <p>22 A I don't know.</p> <p>23 Q You don't recall?</p> <p>24 A I don't recall.</p> <p>25 Q Do you think you knew at the time or</p>

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<p style="text-align: right;">Page 308</p> <p>1 you're not sure?</p> <p>2 A I don't know. Sometimes they give me</p> <p>3 name and I can find out if the person is there.</p> <p>4 Sometime they give me like give us something, you</p> <p>5 know, prior to like a one year, two year. I just</p> <p>6 told them I cannot get it from my record because my</p> <p>7 record goes so far. So I don't know what their</p> <p>8 specific demand was that time.</p> <p>9 Q And you're saying you don't know why they</p> <p>10 were asking you to prepare this report?</p> <p>11 A Repeat the question. Repeat the</p> <p>12 question.</p> <p>13 Q Do you know why FBI Agent Strickland was</p> <p>14 asking you to prepare that report?</p> <p>15 A No.</p> <p>16 Q If there were a series of murders at the</p> <p>17 United Inn and Suites, is it fair to say that the</p> <p>18 United Inn and Suites would discuss steps that the</p> <p>19 hotel could take to try to address the violent</p> <p>20 crime on the property?</p> <p>21 MS. RICHENS: Objection as to form.</p> <p>22 MR. UNDERRINER: Objection.</p> <p>23 A I don't know.</p> <p>24 BY MR. BOUCHARD:</p> <p>25 Q You're the owner of the hotel,</p>	<p style="text-align: right;">Page 310</p> <p>1 with the Criminal Investigations Division of the</p> <p>2 Rockdale County Sheriff's Office. Do you see that?</p> <p>3 A Say again, please. I didn't pay</p> <p>4 attention.</p> <p>5 Q You see that Investigator T. Wade, who is</p> <p>6 the author of this email, works for the Rockdale</p> <p>7 County Sheriff's Office in the Criminal</p> <p>8 Investigations Division?</p> <p>9 A Right.</p> <p>10 Q This email was sent from Mr. Wade to</p> <p>11 unitedinn4649@gmail.com, right?</p> <p>12 A Right.</p> <p>13 Q Is that the hotel's email account?</p> <p>14 A Right.</p> <p>15 Q Did the hotel receive this email?</p> <p>16 A Yes.</p> <p>17 Q Did you review this email at the time</p> <p>18 that it was sent in October 2018?</p> <p>19 A Certainly I look at the email.</p> <p>20 Q As of October 2018 -- let me back up and</p> <p>21 phrase it differently. Throughout the period in</p> <p>22 question, that is 2017 through 2019, Mr. Shareef,</p> <p>23 was it your practice to regularly review and read</p> <p>24 emails sent to unitedinn4649@gmail.com?</p> <p>25 A Yes.</p>
<p style="text-align: right;">Page 309</p> <p>1 Mr. Shareef. If there's two murders in a month at</p> <p>2 the United Inn and Suites, would you as the owner</p> <p>3 and general manager of the hotel want to evaluate</p> <p>4 security steps in place at the hotel?</p> <p>5 MS. RICHENS: Objection as to form.</p> <p>6 A I have my -- the officers, they are</p> <p>7 working for me, and I think that's the source I am</p> <p>8 using. And also, you know, call the, you know, 911</p> <p>9 or, you know, DeKalb County Police.</p> <p>10 BY MR. BOUCHARD:</p> <p>11 Q What I am trying to understand is what</p> <p>12 would you need to see as the owner and general</p> <p>13 manager of the hotel in order to decide I need to</p> <p>14 enhance the security in effect at my property?</p> <p>15 MR. UNDERRINER: Object to the form.</p> <p>16 A I just seek help from my officers and the</p> <p>17 local police.</p> <p>18 (Plaintiff's Exhibit 7 marked)</p> <p>19 BY MR. BOUCHARD:</p> <p>20 Q I'm showing you what's been marked as</p> <p>21 Plaintiff's Exhibit 7. This is an email that was</p> <p>22 Bates stamped NBI 3099 from Tim Wade to the United</p> <p>23 Inn and Suites' Gmail account. Do you see that?</p> <p>24 A Yes.</p> <p>25 Q And it says that Investigator T. Wade is</p>	<p style="text-align: right;">Page 311</p> <p>1 Q That was your regular practice?</p> <p>2 A Yes.</p> <p>3 Q And as the owner and general manager you</p> <p>4 wanted to be aware of the emails --</p> <p>5 A That's right.</p> <p>6 Q -- coming into the hotel?</p> <p>7 A Uh-huh.</p> <p>8 Q Is that correct?</p> <p>9 A Yes.</p> <p>10 Q Do you recall receiving this email as we</p> <p>11 sit here today?</p> <p>12 A I'm looking at it. I think I have seen</p> <p>13 it.</p> <p>14 Q And you see the subject line is, quote,</p> <p>15 Missing Juvenile Maybe at United Inn Hotel on</p> <p>16 Memorial Drive, end quote?</p> <p>17 A Right.</p> <p>18 Q And the content of the email says: I was</p> <p>19 asked by the guardian of J.G. who stated that her</p> <p>20 niece was at this hotel with some friends. Thank</p> <p>21 you for your help.</p> <p>22 Do you see that?</p> <p>23 A Yes.</p> <p>24 Q What do you understand the word juvenile</p> <p>25 to mean?</p>

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<p style="text-align: right;">Page 312</p> <p>1 A Underage person. 2 (Plaintiff's Exhibit 8 marked) 3 BY MR. BOUCHARD: 4 Q I'm showing you what's been marked as 5 Plaintiff's Exhibit 8. This is another email from 6 Investigator Wade. If you compare it to 7 Plaintiff's Exhibit 7, you'll see that it was sent 8 one second after Plaintiff's Exhibit 7. Do you see 9 that? 10 A Yes. 11 Q And this email has a subject line that 12 says Missing Juvenile; is that right? 13 A Right. 14 Q And it has an attachment to it. Do you 15 see that? I'm going to give you the attachment in 16 a second. But underneath the subject line it says 17 Attachments. 18 A Yes. 19 Q This is an email that the United Inn and 20 Suites received; is that correct? 21 A Yes. 22 Q Because it was sent, again, to the same 23 email address as Plaintiff's Exhibit 7? 24 A Right. 25 (Plaintiff's Exhibit 9 marked)</p>	<p style="text-align: right;">Page 314</p> <p>1 about the -- some crimes. Maybe that's coming from 2 there. I don't recall. 3 Q I can represent to you that it means be 4 on the lookout for. Is that new information to you 5 or is that something you're aware of? 6 A No, I certainly don't call this 7 abbreviation -- don't recall this abbreviation. 8 Q Recall this? 9 A Abbreviation. 10 MR. UNDERRINER: Abbreviation. 11 BY MR. BOUCHARD: 12 Q Abbreviation. But you see underneath 13 BOLO it says Missing Person? 14 A Right. 15 Q And you understand what that means? 16 A Uh-huh. 17 Q Right? 18 A Yes. 19 Q And it says that Rockdale County is 20 looking for this missing person, correct? 21 A Yes. 22 Q As of October 9th, 2018, correct? 23 A Yes. 24 Q And the email that you received from Tim 25 Wade, which is Plaintiff's Exhibit 8, was dated</p>
<p style="text-align: right;">Page 313</p> <p>1 BY MR. BOUCHARD: 2 Q I'm showing you Plaintiff's Exhibit 9 3 which is Bates stamped NBI 3107. This was attached 4 to the email Plaintiff's Exhibit 8 that we were 5 just looking at, Mr. Shareef. Did you open up that 6 email that we were just looking at and the 7 attachment to it when you received it in 8 October 2018? 9 A I don't know. But I may have. 10 Q Do you recall seeing this notice which is 11 Plaintiff's Exhibit 9? 12 A No, I don't recall. 13 Q Is this the first time you're seeing 14 this? 15 A Yes. 16 Q You have not seen this prior to today? 17 A No. 18 Q Do you know what BOLO stands for? 19 A BOLO stand for? 20 Q B-O-L-O. 21 A BOLO stand for. 22 Q Do you know what that means, BOLO? 23 A I don't recall. But I may have sitting 24 in one of the Police, Sheriff, or maybe DeKalb 25 County Police meeting and we got some material</p>	<p style="text-align: right;">Page 315</p> <p>1 October 29th, 2018, right? 2 A Yes. 3 Q So at this point according to my math she 4 had been missing for about 20 days? 5 A Yes. 6 Q And it provides a photo of her? 7 A Uh-huh. 8 Q Is that correct? 9 A Uh-huh (affirmative). 10 Q And remember, sir, we need audible yes or 11 nos. 12 A Yes. I'm sorry about that. 13 Q And it provides her name? 14 A Yes. 15 Q J.G., do you see that? 16 A Yes. 17 Q Who is J.G. in this lawsuit against 18 United Inn and Suites. 19 A Yes. 20 Q Do you understand that? 21 A Yes. 22 Q And it also provides her age, race, hair 23 color, eye color, height, and weight. 24 A Yes. 25 Q Do you see that?</p>

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<p style="text-align: right;">Page 316</p> <p>1 A Yes.</p> <p>2 Q It says a little bit further down on</p> <p>3 Plaintiff's Exhibit 9: Anyone with information</p> <p>4 about this case is asked to contact, and it</p> <p>5 provides office, cell numbers, and a 24-hour number</p> <p>6 to contact. Do you see that?</p> <p>7 A Yes.</p> <p>8 Q If I heard you correctly, Mr. Shareef,</p> <p>9 you have not ever seen Plaintiff's Exhibit 9 before</p> <p>10 today; is that correct?</p> <p>11 A That maybe 2017 we will see it when we</p> <p>12 open the email. I'm going to give you example. I</p> <p>13 don't know if that works or not. There are few</p> <p>14 missing person when police officer came. We put it</p> <p>15 in our office bulletin board, we put it there and</p> <p>16 it stay there. But I don't remember all these</p> <p>17 names.</p> <p>18 Q How many missing person reports have you</p> <p>19 received regarding minors?</p> <p>20 A Right. Minors, I don't know about the</p> <p>21 minor report. But the missing person, I mean even</p> <p>22 right now in my, you know, front desk we have maybe</p> <p>23 ten pictures missing persons.</p> <p>24 Q Are any of them minors?</p> <p>25 A It could have been. I don't know. I</p>	<p style="text-align: right;">Page 318</p> <p>1 unable to discern whether somebody looks like a</p> <p>2 minor or not?</p> <p>3 MR. UNDERRINER: Object to the form.</p> <p>4 A Looking at this picture, yes.</p> <p>5 BY MR. BOUCHARD:</p> <p>6 Q Based on this photo you cannot tell --</p> <p>7 A I cannot.</p> <p>8 Q -- if she looks like a minor?</p> <p>9 A I cannot.</p> <p>10 Q But you know that it says her current age</p> <p>11 is 16?</p> <p>12 A I can read.</p> <p>13 Q Did you ever contact Investigator Wade?</p> <p>14 A I might have been. I don't know what I</p> <p>15 respond via email or anything, you know. What</p> <p>16 record, you know, they ask me if I had the record.</p> <p>17 I must have send it to them whatever question they</p> <p>18 have.</p> <p>19 Q It is okay if the answer is no or I don't</p> <p>20 know. My question was very straightforward.</p> <p>21 A Right.</p> <p>22 Q Did you ever contact Investigator Wade?</p> <p>23 A Again, I don't know. Maybe I have been.</p> <p>24 Q You may have, you may have not?</p> <p>25 A Right.</p>
<p style="text-align: right;">Page 317</p> <p>1 don't recall right now.</p> <p>2 Q Well, I don't know what other notices you</p> <p>3 may have at your front desk right now. But</p> <p>4 Plaintiff's Exhibit 9 identifies J.G., J.G. as a</p> <p>5 minor --</p> <p>6 A Right.</p> <p>7 Q -- is that correct?</p> <p>8 A Yes.</p> <p>9 Q And she looks like a minor in this photo,</p> <p>10 does she not?</p> <p>11 A I don't know.</p> <p>12 MS. RICHENS: Objection as to form.</p> <p>13 BY THE VIDEOGRAPHER:</p> <p>14 Q Well, I'm asking for your perception,</p> <p>15 Mr. Shareef.</p> <p>16 A I don't know. I cannot say anything</p> <p>17 about this.</p> <p>18 Q You have no opinion whatsoever?</p> <p>19 A No.</p> <p>20 Q You are responsible for the security at</p> <p>21 the property; is that true?</p> <p>22 A Uh-huh (affirmative). Yes.</p> <p>23 Q As the general manager?</p> <p>24 A Right.</p> <p>25 Q And your position is that you are totally</p>	<p style="text-align: right;">Page 319</p> <p>1 Q You do not know; is that true?</p> <p>2 A I do not know.</p> <p>3 Q Do you have any knowledge of whether</p> <p>4 Mr. Islam contacted Investigator Wade?</p> <p>5 A I don't think so. But this inspector may</p> <p>6 come back and, you know, talk to him. I don't</p> <p>7 know.</p> <p>8 Q Do you have a recollection of</p> <p>9 Investigator Wade ever coming to the United Inn and</p> <p>10 Suites?</p> <p>11 A No.</p> <p>12 Q You do not recall?</p> <p>13 A No.</p> <p>14 Q Mr. Shareef, do you agree with me that</p> <p>15 there being a missing youth who is suspected of</p> <p>16 being at the United Inn and Suites is a priority</p> <p>17 matter?</p> <p>18 MR. UNDERRINER: Object to form.</p> <p>19 MS. RICHENS: Same objection.</p> <p>20 A I don't know how to answer that.</p> <p>21 BY MR. BOUCHARD:</p> <p>22 Q As the owner and general manager, would</p> <p>23 it concern you if a police officer called you and</p> <p>24 said we have a credible lead that there's a missing</p> <p>25 minor at your hotel?</p>

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<p>1 MS. RICHENS: Objection as to form.</p> <p>2 A I mean they always come and they ask this</p> <p>3 question. And like I said, I give them the record,</p> <p>4 I open the door. If they says look I think, you</p> <p>5 know, that such and such room we need to check. So</p> <p>6 I always help them. But that's my concern, if</p> <p>7 there is any, I help them. So I don't know what --</p> <p>8 how to answer you. Concern me, of course concern</p> <p>9 me and I help them solve the issue.</p> <p>10 BY MR. BOUCHARD:</p> <p>11 Q Well, that's an answer.</p> <p>12 A Okay.</p> <p>13 Q Yes, it concerns you if there's --</p> <p>14 A Okay.</p> <p>15 Q -- a missing minor at the hotel?</p> <p>16 A Okay.</p> <p>17 Q Is that correct?</p> <p>18 A Yes.</p> <p>19 Q Would you want to it concern the staff at</p> <p>20 the hotel too?</p> <p>21 A Yes.</p> <p>22 Q Would you train your staff to care about</p> <p>23 things like that?</p> <p>24 A Yeah. They have -- they have known, you</p> <p>25 know, if they see some suspicious thing, they tell</p>	<p>1 Q Did the hotel receive this email as well?</p> <p>2 A Yes.</p> <p>3 Q Did you review this email?</p> <p>4 A Yes.</p> <p>5 Q And you see it says Subject Missing</p> <p>6 Person; is that right?</p> <p>7 A Right.</p> <p>8 Q And the body of the email says: Ashar</p> <p>9 was advised by her guardian that she was staying at</p> <p>10 United Inn located at 4649 Memorial Drive. Thank</p> <p>11 you for your help.</p> <p>12 Do you see that?</p> <p>13 A Right.</p> <p>14 Q And as you can see, there's an attachment</p> <p>15 to Plaintiff's Exhibit 10 which is identical to the</p> <p>16 BOLO notice that we already looked at.</p> <p>17 A Right.</p> <p>18 Q Do you recall that?</p> <p>19 A Right.</p> <p>20 Q Mr. Shareef, we have talked about three</p> <p>21 emails from Investigator Wade on October 29th, 2018</p> <p>22 and two BOLO notices. What, if anything, did the</p> <p>23 United Inn do in response to these emails and these</p> <p>24 BOLO notices?</p> <p>25 A The response would be if I see this girl,</p>
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<p>1 me. I talk to other -- you know, they can call the</p> <p>2 police, you know, or they call 911 or they tell me,</p> <p>3 I call my police officer. Most the time call the</p> <p>4 local police.</p> <p>5 MS. RICHENS: David, may we take a quick</p> <p>6 break?</p> <p>7 MR. BOUCHARD: Sure.</p> <p>8 THE VIDEOGRAPHER: Off the record at</p> <p>9 2:29 p.m.</p> <p>10 (Recess 2:29-2:41 p.m.)</p> <p>11 THE VIDEOGRAPHER: Back on the record at</p> <p>12 2:41 p.m.</p> <p>13 (Plaintiff's Exhibit 10 marked)</p> <p>14 BY MR. BOUCHARD:</p> <p>15 Q Mr. Shareef, I'm handing you what's been</p> <p>16 marked as Plaintiff's Exhibit 10 which is Bates</p> <p>17 stamped NBI 3097 to 3098. Do you see that,</p> <p>18 Mr. Shareef?</p> <p>19 A Yes.</p> <p>20 Q And you see it is another email from</p> <p>21 Investigator Tim Wade on October 29th, 2018?</p> <p>22 A Yes.</p> <p>23 Q And it is also to</p> <p>24 unitedinn4649@gmail.com?</p> <p>25 A Right.</p>	<p>1 we notify whoever is, you know, concerning about</p> <p>2 this email, this time this Mr. T. Wade. So that's</p> <p>3 what it is.</p> <p>4 Q I can represent to you, Mr. Shareef, that</p> <p>5 I did not see a response to Investigator Wade in</p> <p>6 your emails. Do you believe that you did respond</p> <p>7 to Investigator Wade?</p> <p>8 A We may have communicated via phone with</p> <p>9 Wade.</p> <p>10 Q Do you recall doing so?</p> <p>11 A No.</p> <p>12 Q Do you know if anybody else on behalf of</p> <p>13 United Inn communicated with Investigator Wade?</p> <p>14 A I see this email name Ashar, so might</p> <p>15 have talked to Ashar and Ashar talk to him.</p> <p>16 Q Did you ever communicate with Ashar about</p> <p>17 his communication with Investigator Wade?</p> <p>18 A Maybe that time. But I don't know.</p> <p>19 Q You don't recall as you --</p> <p>20 A No.</p> <p>21 Q -- sit here today?</p> <p>22 A No.</p> <p>23 Q Do you recall whether you held a staff</p> <p>24 meeting to talk about these missing juvenile</p> <p>25 notices?</p>

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<p style="text-align: right;">Page 324</p> <p>1 A No.</p> <p>2 Q You did not hold one or you do not</p> <p>3 recall?</p> <p>4 A I do not recall.</p> <p>5 Q Did you post a photo of J.G. at the</p> <p>6 hotel?</p> <p>7 A I may have. But I don't recall.</p> <p>8 Q Where would you have posted it?</p> <p>9 A Post it in the office where everybody</p> <p>10 comes in every day.</p> <p>11 Q Where is that?</p> <p>12 A It is in the office.</p> <p>13 Q Are you talking about in the lobby?</p> <p>14 A No, not lobby. In the office back, I can</p> <p>15 say back of the office.</p> <p>16 Q Who goes in there every day?</p> <p>17 A All the employees go there.</p> <p>18 Q Would you have made an announcement to</p> <p>19 all the employees that you have just posted this</p> <p>20 new photo of a missing juvenile reported to be at</p> <p>21 the hotel?</p> <p>22 A I don't recall.</p> <p>23 Q Did you send this photo of J.G. to</p> <p>24 Sergeant Weber?</p> <p>25 A I may have, you know, talked with him the</p>	<p style="text-align: right;">Page 326</p> <p>1 are there, so you look around and see if the person</p> <p>2 you see. Maybe they are around and sometime</p> <p>3 they're not there, you know.</p> <p>4 Q Are you testifying to something that</p> <p>5 might have happened or that you recall happening?</p> <p>6 A No. No. I am testifying that when any</p> <p>7 picture --</p> <p>8 Q Well, I'm not talking about any picture.</p> <p>9 I'm specifically asking do you recall sharing this</p> <p>10 photo of J.G. with Weber and McClelland?</p> <p>11 A I may have tell them that look at that</p> <p>12 board there, we put the picture there. Other than</p> <p>13 that I don't recall.</p> <p>14 Q You may have told them?</p> <p>15 A Yeah.</p> <p>16 Q But you may have not told them; is that</p> <p>17 what you're saying?</p> <p>18 A I don't recall.</p> <p>19 Q You do not recall --</p> <p>20 A Yeah.</p> <p>21 Q -- if you told them?</p> <p>22 A Yeah.</p> <p>23 Q Correct?</p> <p>24 A I don't recall what I tell them is what I</p> <p>25 am saying.</p>
<p style="text-align: right;">Page 325</p> <p>1 same night, you know, look at that, you know, photo</p> <p>2 or something. We may have talked.</p> <p>3 Q You do not recall?</p> <p>4 A I don't recall.</p> <p>5 Q What about Sergeant McClelland?</p> <p>6 A I don't recall.</p> <p>7 Q If you had sent it to either of those</p> <p>8 gentlemen, you would have sent it to them by text</p> <p>9 message; is that correct?</p> <p>10 A I sent them a text message or maybe I</p> <p>11 called them and said look, when you come in, you</p> <p>12 know, look at this picture, you know, see if you</p> <p>13 see this, you know, person.</p> <p>14 Q Well, I can represent to you that I have</p> <p>15 what I believe are your text messages from 2017 to</p> <p>16 2019 with Weber and McClelland. I have not seen a</p> <p>17 text message with that photo.</p> <p>18 A Okay.</p> <p>19 Q Is there some other way you might have</p> <p>20 sent her photo to Weber or McClelland or is there</p> <p>21 no other way other than by text message?</p> <p>22 A I mean they come there every day, so we</p> <p>23 just tell them look at this picture, you know, when</p> <p>24 you come in. Because maybe we didn't see such and</p> <p>25 such person, you know, so we tell them look, you</p>	<p style="text-align: right;">Page 327</p> <p>1 Q Is it possible you did not tell them</p> <p>2 about this photo?</p> <p>3 A I don't know.</p> <p>4 Q I am taking it the answer is no because</p> <p>5 we have beaten this drum about the security at the</p> <p>6 hotel. But I need to ask just to be sure. Did the</p> <p>7 hotel hire any additional security after receiving</p> <p>8 this photo of J.G.?</p> <p>9 A No.</p> <p>10 Q Did the hotel ask Weber or McClelland to</p> <p>11 work more than four hours per day after receiving</p> <p>12 this photo of J.G.?</p> <p>13 A Hotel asked them to when they are, you</p> <p>14 know, in the DeKalb County when they are in this</p> <p>15 area, they come and, you know, visit more often</p> <p>16 there daytime when they working on their regular</p> <p>17 job, so they come visit, you know.</p> <p>18 Q Did the hotel ask them to work more than</p> <p>19 four hours a day after receiving this photo of</p> <p>20 J.G.?</p> <p>21 A No.</p> <p>22 Q Did you ask the DeKalb Police Department</p> <p>23 to help the hotel implement prevention efforts</p> <p>24 after receiving this photo of J.G.?</p> <p>25 A I don't recall.</p>

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<p style="text-align: right;">Page 328</p> <p>1 Q Did you review the list of guests staying 2 at the hotel after you received this photo of J.G.? 3 A I reviewed the guest list, yes. 4 Q For what purpose? 5 A Because I maybe I see the email that they 6 need some record. I don't know if that's the same 7 email or different email. 8 Q I'm not talking about the email from the 9 FBI agent. Is that the email you're thinking 10 about? 11 A Yes. 12 Q I'm talking about the email from 13 Investigator Wade where he's notifying you that 14 he's received information that a minor who is a 15 missing person is at the United Inn and Suites. 16 A I don't recall, you know, what happened 17 after that. 18 Q You don't recall if you reviewed the 19 guest list at the hotel after that? 20 A I don't recall it. 21 Q At any point in time, Mr. Shareef, do you 22 recall talking to J.G.? 23 A I don't think so. 24 Q Are you saying you do not recall or you 25 don't think you recall or what are you saying?</p>	<p style="text-align: right;">Page 330</p> <p>1 A Yes. 2 Q -- Plaintiff's Exhibit 11? 3 A Yes. 4 Q Who is Mr. Ali? 5 A He worked for the Quantum Bank. 6 Q What was his job with Quantum as you 7 understood it? 8 A He is -- I believe he's representing -- I 9 took a loan from Quantum and I think he's 10 representing my account. 11 Q You personally took a loan from Quantum? 12 A No. This is the business loan. 13 Q Why was he contacting you? At least why 14 did you understand he was contacting you in 15 May 2017? 16 A I have to look on the other email what 17 was the reason. Because I contact him, you know, 18 like on a regular basis. I don't know what was the 19 concern. 20 Q In May 2017 he says: Hi, Tahir. Brad 21 and Amy would like to stop by the hotel next week 22 to discuss the problem you are experiencing with 23 the County. Do you have time to meet with us? 24 Please let me know the date and time that's good 25 for you.</p>
<p style="text-align: right;">Page 329</p> <p>1 A I don't recall. I mean there are -- I 2 spoke to six people today and those six they are a 3 family with one child, so I don't know if I see 4 them tomorrow some other place, I don't know if I 5 can recognize their face or not. 6 (Plaintiff's Exhibit 11 marked) 7 BY MR. BOUCHARD: 8 Q Mr. Shareef, I'm showing you Plaintiff's 9 Exhibit 11 which is Bates stamped NBI 2659 through 10 2661. And it is an email chain between a Mr. Ali 11 with Quantum Bank and you; is that correct? 12 A Yes. 13 MS. RICHENS: Take a moment and review 14 it, please. 15 BY MR. BOUCHARD: 16 Q And you see it is an email chain -- 17 MS. RICHENS: Let me have him look at it 18 so he can familiarize himself with the document. 19 Thank you. 20 BY MR. BOUCHARD: 21 Q It is just that one page, Mr. Shareef. 22 A Okay. 23 Q Two of the three pages are legal 24 disclaimers, so you can thank lawyers for that. 25 Have you had a chance to review --</p>	<p style="text-align: right;">Page 331</p> <p>1 Do you see that? 2 A Yeah. 3 Q Do you recall a problem you were 4 experiencing with the County in May 2017? 5 A I might have those ordinance ticket from 6 them, and that could be the problem. I don't know 7 what the other problem is. 8 Q I'll show you some documents. I think 9 your suspicions are correct that that is the 10 problem that he's referencing. But you can decide 11 for yourself when I show you the documents. 12 A Okay. 13 Q Who are Brad and Amy? 14 A They are his colleagues. 15 Q They work for Quantum Bank? 16 A Yes. 17 Q How many times have Mr. Ali, Brad, Amy, 18 any other representatives from Quantum Bank been to 19 the United Inn and Suites? 20 A Maybe once or twice a year. Maybe some 21 years they don't. 22 Q What's your understanding of why they 23 come? 24 A Because basically that's their property 25 and they are coming there to see if the property</p>

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<p style="text-align: right;">Page 332</p> <p>1 looks okay to them.</p> <p>2 Q What was your understanding of why Brad</p> <p>3 and Amy wanted to stop by to discuss the problem</p> <p>4 you were experiencing with the County?</p> <p>5 MS. RICHENS: Objection as to form.</p> <p>6 A I don't know. I'm just guessing that</p> <p>7 could be the, you know, the ordinance ticket I got</p> <p>8 from the DeKalb County Code Enforcement.</p> <p>9 BY MR. BOUCHARD:</p> <p>10 Q I mean I'm just reading this email that</p> <p>11 you received. I didn't receive it, right?</p> <p>12 A Yeah.</p> <p>13 Q And it looks like you set up a meeting</p> <p>14 here?</p> <p>15 A Uh-huh (affirmative).</p> <p>16 Q You agree with me?</p> <p>17 A Yes.</p> <p>18 Q Did you meet with them?</p> <p>19 A I must have.</p> <p>20 Q In May 2017?</p> <p>21 A I must have.</p> <p>22 Q Do you recall the meeting?</p> <p>23 A I really don't.</p> <p>24 Q Do you recall who attended?</p> <p>25 A No.</p>	<p style="text-align: right;">Page 334</p> <p>1 says Current Liabilities?</p> <p>2 A Yes.</p> <p>3 Q And then underneath that it says Loan</p> <p>4 From Shareholder \$1,037,401?</p> <p>5 A Uh-huh (affirmative).</p> <p>6 Q Do you see that?</p> <p>7 A Yes.</p> <p>8 Q Who is the shareholder who loaned money</p> <p>9 that's being referenced there?</p> <p>10 A I need to talk to my CPA. I need to talk</p> <p>11 to my CPA about this. This is accounting done by</p> <p>12 the CPA.</p> <p>13 Q Who were the shareholders of Northbrook</p> <p>14 Industries?</p> <p>15 A Basically myself and Dr. Sab.</p> <p>16 Q Dr. Sabharwal?</p> <p>17 A Yeah, Sabharwal.</p> <p>18 Q The two of you?</p> <p>19 A Yeah.</p> <p>20 Q Anybody else?</p> <p>21 A No.</p> <p>22 Q Did one of the two of you make a loan to</p> <p>23 United Inn and Suites?</p> <p>24 A Yeah. We both made the loan.</p> <p>25 Q So is that what that's referring to?</p>
<p style="text-align: right;">Page 333</p> <p>1 Q Do you have any notes from the meeting?</p> <p>2 A No.</p> <p>3 Q Do you know where the meeting occurred,</p> <p>4 Mr. Shareef?</p> <p>5 A I don't know. Could be in the McDonald.</p> <p>6 Could be at the office. I don't know.</p> <p>7 (Plaintiff's Exhibit 12 marked)</p> <p>8 BY MR. BOUCHARD:</p> <p>9 Q I'm showing you Plaintiff's Exhibit 12</p> <p>10 which is NBI 928 to 929. Mr. Shareef, this is a</p> <p>11 two-page document that is Northbrook Industries,</p> <p>12 Inc.'s Balance Sheet as of December 31, 2018 on</p> <p>13 page 1 and Income Statement on page 2. Do you see</p> <p>14 that?</p> <p>15 A Yes.</p> <p>16 Q I wanted to just ask you in the middle of</p> <p>17 the first page, that is page 928 of Exhibit 12, it</p> <p>18 says Liabilities and Capital. Do you see that?</p> <p>19 Right in the middle of the first page it says --</p> <p>20 A Yeah.</p> <p>21 Q -- Liabilities and --</p> <p>22 A Yes.</p> <p>23 Q -- Capital?</p> <p>24 A Yes.</p> <p>25 Q And do you see to the left of that it</p>	<p style="text-align: right;">Page 335</p> <p>1 A Yeah, that could be. I'm not a hundred</p> <p>2 percent certain. Has to be.</p> <p>3 Q When did you make the loan?</p> <p>4 A Maybe few years back or maybe in the</p> <p>5 beginning. I don't know.</p> <p>6 Q And when you said you made a loan, what</p> <p>7 do you mean by that?</p> <p>8 A Because we're doing some upgrading in the</p> <p>9 property.</p> <p>10 Q But whose money was it that was loaned?</p> <p>11 A That could be mine, could be</p> <p>12 Dr. Sabharwal.</p> <p>13 Q I am surprised you wouldn't know if you</p> <p>14 had loaned your money to the business. Because</p> <p>15 wouldn't you be expecting the business to pay you</p> <p>16 back?</p> <p>17 A Yes.</p> <p>18 Q Is the business paying you back?</p> <p>19 A Business is paying me back.</p> <p>20 Q For your loan?</p> <p>21 A Yes.</p> <p>22 Q Is the business paying Mr. Sabharwal back</p> <p>23 for his loan?</p> <p>24 A I have to check with my CPA how they</p> <p>25 write those papers.</p>

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<p style="text-align: right;">Page 336</p> <p>1 Q Who writes the checks to pay back the</p> <p>2 loan? Do you not write those yourself?</p> <p>3 A Yeah, I do write it.</p> <p>4 Q Do you write Dr. Sabharwal checks to pay</p> <p>5 back his loan?</p> <p>6 A I do write it.</p> <p>7 Q When did you make the loan to Northbrook</p> <p>8 Industries, Inc. approximately?</p> <p>9 A I don't know what was the dates.</p> <p>10 Q Well, was it -- this is from 2018, so it</p> <p>11 must have been before that?</p> <p>12 A Yeah. Yeah.</p> <p>13 Q Approximately how long before that?</p> <p>14 A I don't recall this thing.</p> <p>15 Q Several years before?</p> <p>16 A Could be.</p> <p>17 Q Is the loan that we're talking about</p> <p>18 related to the Quantum Bank loan that Mr. Ali was</p> <p>19 emailing you about or are those two separate</p> <p>20 things?</p> <p>21 A I believe they're two separate things I</p> <p>22 guess.</p> <p>23 Q Is there any documentation relating to</p> <p>24 the loan that you personally made to Northbrook</p> <p>25 Industries, Inc.?</p>	<p style="text-align: right;">Page 338</p> <p>1 I took money from the friends. So I don't know,</p> <p>2 you know, what is this total numbers for.</p> <p>3 Q Well, of that \$1,037,401 loan from</p> <p>4 shareholder, how much of that do you think was your</p> <p>5 money, Mr. Shareef, and how much do you think was</p> <p>6 Dr. Sabharwal's?</p> <p>7 A I don't know.</p> <p>8 Q Approximately, sir?</p> <p>9 A I don't know.</p> <p>10 Q You cannot approximate?</p> <p>11 A No, I can't.</p> <p>12 Q I mean is it 50/50, you contributed</p> <p>13 500,000 and he contributed approximately 500,000,</p> <p>14 or was it different than that?</p> <p>15 A I don't know.</p> <p>16 Q Who would know that?</p> <p>17 A I'm going to check directly with the CPA,</p> <p>18 so maybe he have something.</p> <p>19 Q What's your CPA's name?</p> <p>20 A His name is Habib, Mr. Habib.</p> <p>21 Q Can you spell that, please.</p> <p>22 A Habib Ismail, H-A-B-I-B, I-S-M-A-I-L.</p> <p>23 Q And he works in Atlanta?</p> <p>24 A Yeah.</p> <p>25 Q What's the name of his company?</p>
<p style="text-align: right;">Page 337</p> <p>1 A I don't know. I'm going to check with</p> <p>2 the CPA.</p> <p>3 Q Well, did you sign a document with the</p> <p>4 business or did you just loan money to the</p> <p>5 business?</p> <p>6 A I don't know. I'll have to check with</p> <p>7 the CPA.</p> <p>8 Q Do you know about Dr. Sabharwal whether</p> <p>9 he signed a loan document or whether he just loaned</p> <p>10 money to the business?</p> <p>11 A I have to check with the CPA.</p> <p>12 Q It says on the second page of Plaintiff's</p> <p>13 Exhibit 12 on the Income Statement towards the very</p> <p>14 bottom in the section on Expenses, towards the very</p> <p>15 bottom of the section on Expenses it says Loan Cost</p> <p>16 Amortization. Do you see that?</p> <p>17 A Yes.</p> <p>18 Q Do you know what loan that pertains to?</p> <p>19 A No. I have to check with the CPA.</p> <p>20 Q Other than the loan from Quantum Bank and</p> <p>21 the loan that you and Dr. Sabharwal made, are you</p> <p>22 aware of any other loans to Northbrook Industries,</p> <p>23 Inc.?</p> <p>24 A I could have been. But I don't know.</p> <p>25 You know, when we running this business, you know,</p>	<p style="text-align: right;">Page 339</p> <p>1 A Name of the company. Alischild,</p> <p>2 A-L-I-C-H-I-L-D. Alischild.</p> <p>3 Q The money that you contributed towards</p> <p>4 that 1,037,000 loan, was that your personal money</p> <p>5 or money from somebody else?</p> <p>6 A I may have collected from the friends,</p> <p>7 you know, to use the money.</p> <p>8 Q Did you promise to repay those friends --</p> <p>9 A Yes.</p> <p>10 Q -- back?</p> <p>11 A Yes.</p> <p>12 Q In writing or is that an oral promise?</p> <p>13 A Just oral promises.</p> <p>14 Q Do you believe there's documents from the</p> <p>15 business promising to pay you back or is it just</p> <p>16 kind of an oral understanding?</p> <p>17 A Just an understanding.</p> <p>18 Q When we met in February, you said that in</p> <p>19 2014 Mr. Sabharwal's stake in Northbrook</p> <p>20 Industries, Inc. changed from 50 percent to</p> <p>21 19 percent. Do you remember that?</p> <p>22 A Right.</p> <p>23 Q And I think you said that was in</p> <p>24 connection with the Quantum Bank loan. Do you</p> <p>25 recall?</p>

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<p style="text-align: right;">Page 340</p> <p>1 A Connection with the Quantum loan?</p> <p>2 Q I thought you had told me in February</p> <p>3 that in 2014 you went to Quantum Bank.</p> <p>4 A Right.</p> <p>5 Q And the shares and stakes between you and</p> <p>6 Dr. Sabharwal were adjusted?</p> <p>7 A Yes. Yes.</p> <p>8 Q Is that related to the email from Mr. Ali</p> <p>9 at Quantum Bank, would he have been involved in</p> <p>10 that process in 2014?</p> <p>11 A No. That would have been a different</p> <p>12 person that work at Ali's office I guess.</p> <p>13 Q But you had one loan with Quantum Bank;</p> <p>14 is that right?</p> <p>15 A Yeah.</p> <p>16 (Plaintiff's Exhibit 13 marked)</p> <p>17 BY MR. BOUCHARD:</p> <p>18 Q Showing you Plaintiff's Exhibit 13 which</p> <p>19 is from the Magistrate Court of DeKalb County, and</p> <p>20 it is Bates stamped NBI 2794 to 2803. Do you see</p> <p>21 that, sir?</p> <p>22 A Yes.</p> <p>23 Q And the Date of Notice in the top</p> <p>24 right-hand corner of Plaintiff's Exhibit 13 is</p> <p>25 May 12th, 2017.</p>	<p style="text-align: right;">Page 342</p> <p>1 Q But you did receive this document, you</p> <p>2 remember it?</p> <p>3 A Yes.</p> <p>4 (Plaintiff's Exhibit 14 marked)</p> <p>5 BY MR. BOUCHARD:</p> <p>6 Q Showing you Plaintiff's Exhibit 14. This</p> <p>7 is another notice from the Magistrate Court of</p> <p>8 DeKalb County, and it is Bates stamped NBI 2701</p> <p>9 through NBI 2708. Do you see that?</p> <p>10 A Right.</p> <p>11 Q This notice is dated September 14th,</p> <p>12 2017, correct?</p> <p>13 A Yes.</p> <p>14 Q And once again, there's a lengthy</p> <p>15 single-spaced list of what I believe to be</p> <p>16 violations according to the DeKalb County Code</p> <p>17 Enforcement Division. Is that your understanding?</p> <p>18 A Right.</p> <p>19 Q And I am not sure why there are some</p> <p>20 blank pages in the middle, but I'll represent to</p> <p>21 you that this is how it was produced to us.</p> <p>22 A Okay.</p> <p>23 Q Do you see on NBI 2707, which is the</p> <p>24 second to last page, it says: You are hereby</p> <p>25 notified that an arraignment/trial/hearing will be</p>
<p style="text-align: right;">Page 341</p> <p>1 A Right.</p> <p>2 Q Do you see that?</p> <p>3 A Uh-huh (affirmative). Yes.</p> <p>4 Q And there's a lengthy single spaced list</p> <p>5 that goes on for four pages. Do you see that?</p> <p>6 A Right.</p> <p>7 Q Do you understand these to be what the</p> <p>8 DeKalb County Court Code Enforcement Division</p> <p>9 considered to be violations?</p> <p>10 A Yes.</p> <p>11 Q And then on page 2798, if you look at the</p> <p>12 bottom right-hand corner 2798, you see that it</p> <p>13 says: You are hereby notified that an arraignment/</p> <p>14 trial/hearing will be held on the above citations</p> <p>15 in the Magistrate Court of DeKalb County on</p> <p>16 June 6th, 2017.</p> <p>17 A Right.</p> <p>18 Q Do you see that?</p> <p>19 Do you think this might be related to the</p> <p>20 email that you got on May 11th, 2017 from Mr. Ali?</p> <p>21 A Could have been, yes.</p> <p>22 Q The notice goes on and there's another</p> <p>23 lengthy list of violations. I don't know if this</p> <p>24 is the same list or a different list. Do you know?</p> <p>25 A No, I don't know.</p>	<p style="text-align: right;">Page 343</p> <p>1 held on the above citations in Magistrate Court of</p> <p>2 DeKalb County on October 17th, 2017?</p> <p>3 A Right.</p> <p>4 Q Do you recall receiving this notice?</p> <p>5 A Yes.</p> <p>6 Q Mr. Shareef, was this notice to your</p> <p>7 understanding in Plaintiff's Exhibit 14 related to</p> <p>8 the notice in Plaintiff's Exhibit 13?</p> <p>9 A Yes.</p> <p>10 Q They're related?</p> <p>11 A Right.</p> <p>12 Q In other words, they concern the same</p> <p>13 violations?</p> <p>14 A Right.</p> <p>15 Q After receiving these notices,</p> <p>16 Mr. Shareef, did you hire a lawyer?</p> <p>17 A Yes.</p> <p>18 Q I don't want to, just like I didn't want</p> <p>19 to know what you talked to Ms. Richens or Mr. Brown</p> <p>20 or Mr. Story about, all I want to know is after you</p> <p>21 hired the lawyer, did you make a decision as to</p> <p>22 whether or not you were going to pay the fines that</p> <p>23 the DeKalb County Code Enforcement Division</p> <p>24 assessed?</p> <p>25 A Repeat the question.</p>

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<p style="text-align: right;">Page 344</p> <p>1 Q Yeah. After you hired a lawyer, did you</p> <p>2 decide whether or not to pay the fines that the</p> <p>3 DeKalb County Code Enforcement Division had</p> <p>4 assessed on the United Inn and Suites?</p> <p>5 A Right.</p> <p>6 Q And your decision was to pay the fines;</p> <p>7 is that correct?</p> <p>8 A Yes.</p> <p>9 (Plaintiff's Exhibit 15 marked)</p> <p>10 BY MR. BOUCHARD:</p> <p>11 Q Showing you Plaintiff's Exhibit 15, which</p> <p>12 is Bates stamped NBI 2431 to 2432. Mr. Shareef,</p> <p>13 Plaintiff's Exhibit 15 is on page 1 a Deferred</p> <p>14 Sentencing Order and on page 2 a cashier's check.</p> <p>15 Do you see that?</p> <p>16 A Yes.</p> <p>17 Q The Deferred Sentencing Order says in the</p> <p>18 first paragraph -- well, actually let me back up.</p> <p>19 The Deferred Sentencing Order says at the top In</p> <p>20 the Magistrate Court of DeKalb County, State of</p> <p>21 Georgia, State of Georgia versus Northbrook</p> <p>22 Industries, Inc. d/b/a United Suites; is that</p> <p>23 right?</p> <p>24 A That's right.</p> <p>25 Q Is that your hotel?</p>	<p style="text-align: right;">Page 346</p> <p>1 Q And as you said, you decided to pay the</p> <p>2 fine --</p> <p>3 A Right.</p> <p>4 Q -- is that right?</p> <p>5 And that is reflected on page 2 of</p> <p>6 Plaintiff's Exhibit 15; is that correct?</p> <p>7 A Right.</p> <p>8 Q The cashier's check for \$60,345?</p> <p>9 A Right.</p> <p>10 Q And your understanding was that that was</p> <p>11 the fine for violations of the DeKalb County code?</p> <p>12 A Right.</p> <p>13 (Plaintiff's Exhibit 16 marked)</p> <p>14 BY MR. BOUCHARD:</p> <p>15 Q Showing you Plaintiff's Exhibit 16 which</p> <p>16 I only printed one copy of. Even I don't have a</p> <p>17 copy of it because it is so voluminous. But it is</p> <p>18 Bates stamped NBI 971 to NBI 1228.</p> <p>19 MS. RICHENS: What's happening, is there</p> <p>20 just the original?</p> <p>21 MR. BOUCHARD: Yeah. I just said on the</p> <p>22 record that I have only printed one because it is</p> <p>23 258 pages.</p> <p>24 MS. RICHENS: Okay.</p> <p>25</p>
<p style="text-align: right;">Page 345</p> <p>1 A Yes.</p> <p>2 Q And it says in the first paragraph of</p> <p>3 this Deferred Sentencing Order: The Defendant</p> <p>4 having come before the Court today on the</p> <p>5 above-referenced charges, has entered a plea of</p> <p>6 guilty slash nolo and the Court has accepted the</p> <p>7 Defendant's plea. A final sentencing hearing in</p> <p>8 this matter will be held at 2:00 p.m. on July 16th,</p> <p>9 2018 in the Magistrate Court of DeKalb County</p> <p>10 located at, and it provides the address. As such,</p> <p>11 the Defendant is hereby ordered to appear at said</p> <p>12 sentencing hearing.</p> <p>13 Do you see that?</p> <p>14 A Yes.</p> <p>15 Q The next paragraph says: The Court is</p> <p>16 currently considering sentencing the Defendant to</p> <p>17 pay a fine and state-imposed fees totaling \$60,345.</p> <p>18 If the Defendant pled guilty or nolo and it elects</p> <p>19 to pay the fine and fees under consideration as a</p> <p>20 sentence to the Clerk of the Magistrate Court of</p> <p>21 DeKalb County on or before the sentencing hearing,</p> <p>22 the Court will impose the fine and fees as detailed</p> <p>23 as the sentence in this case.</p> <p>24 Do you see that?</p> <p>25 A Yes.</p>	<p style="text-align: right;">Page 347</p> <p>1 BY MR. BOUCHARD:</p> <p>2 Q Mr. Shareef, I can represent to you that</p> <p>3 on the first page of Plaintiff's Exhibit 16, you</p> <p>4 should see reference to the word Receipt. And what</p> <p>5 I understand Plaintiff's Exhibit 16 --</p> <p>6 MS. RICHENS: May we take a quick look?</p> <p>7 MR. BOUCHARD: Yeah.</p> <p>8 BY MR. BOUCHARD:</p> <p>9 Q Do you see on the first page of</p> <p>10 Plaintiff's Exhibit 16 there's a reference to</p> <p>11 Receipt?</p> <p>12 A Yes.</p> <p>13 Q And I understand Plaintiff's Exhibit 16</p> <p>14 outlines the violations at the United Inn and</p> <p>15 Suites of the DeKalb County code defined for each</p> <p>16 of those violations and then on the very last page</p> <p>17 tells you the total fine owed.</p> <p>18 A Right.</p> <p>19 Q So if you flip to page 258 of Plaintiff's</p> <p>20 Exhibit 16, the very last page, you should see the</p> <p>21 total amount of the fine is \$60,345.</p> <p>22 A Yes.</p> <p>23 Q And you see the amount paid is \$60,345?</p> <p>24 A Right.</p> <p>25 Q Which is what we just saw in the</p>

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<p style="text-align: right;">Page 348</p> <p>1 cashier's check, right?</p> <p>2 A Right.</p> <p>3 Q So that Plaintiff's Exhibit 16 is a full</p> <p>4 listing of each violation and the fine per</p> <p>5 violation, right?</p> <p>6 A Right.</p> <p>7 Q And then the total cost of all of those</p> <p>8 fines was \$60,345?</p> <p>9 A Right.</p> <p>10 Q So after you paid that cashier's check,</p> <p>11 you got that receipt showing that you had paid the</p> <p>12 fine?</p> <p>13 A Right.</p> <p>14 (Plaintiff's Exhibit 17 marked)</p> <p>15 BY MR. BOUCHARD:</p> <p>16 Q Showing you Plaintiff's Exhibit 17. I do</p> <p>17 have copies of it for everybody. This one is much</p> <p>18 shorter. And this is Bates stamped NBI 1233 to</p> <p>19 1235, and it is an email chain between you,</p> <p>20 Mr. Shareef, and a Hope Hathorn with DeKalb County.</p> <p>21 A Right.</p> <p>22 Q Are you familiar with this email chain?</p> <p>23 A Yes.</p> <p>24 Q I want to direct your attention to the</p> <p>25 second page of the email chain which is an email</p>	<p style="text-align: right;">Page 350</p> <p>1 A Yes.</p> <p>2 Q Was the hotel going to have to shut down</p> <p>3 if it didn't pay the fines?</p> <p>4 A Right.</p> <p>5 Q Was that your understanding?</p> <p>6 A Yes.</p> <p>7 Q Mr. Shareef, who is Rashid Iqbal?</p> <p>8 A What is the name?</p> <p>9 Q Who is Rashid Iqbal?</p> <p>10 A Rashid Iqbal, he came work for a little</p> <p>11 bit for me.</p> <p>12 Q Where did he work?</p> <p>13 A At the cleaning and groundsman.</p> <p>14 MS. RICHENS: I'm sorry, what did you</p> <p>15 say?</p> <p>16 THE WITNESS: Cleaning, the groundsman.</p> <p>17 BY MR. BOUCHARD:</p> <p>18 Q Where though? Because you have had</p> <p>19 multiple hotels. Which hotel did he work at?</p> <p>20 A At the United Suites.</p> <p>21 Q In Decatur?</p> <p>22 A Yeah.</p> <p>23 (Plaintiff's Exhibit 18 marked)</p> <p>24 BY MR. BOUCHARD:</p> <p>25 Q I'm showing you Plaintiff's 18 which is</p>
<p style="text-align: right;">Page 349</p> <p>1 from you to a Manfus Housworth and a Thomas Kemp.</p> <p>2 Do you see that?</p> <p>3 A Yes.</p> <p>4 Q And these are individuals who appear to</p> <p>5 have DeKalb County email addresses; is that fair?</p> <p>6 A Right.</p> <p>7 Q Did you understand they worked for DeKalb</p> <p>8 County?</p> <p>9 A Right.</p> <p>10 Q And you say: Dear Housworth, please help</p> <p>11 me in this matter. I went to the Office of DeKalb</p> <p>12 Planning & Sustainability to renew my license. I</p> <p>13 was told in May 2018 Officer D. Chandler had a note</p> <p>14 on my account that do not renew the license.</p> <p>15 Do you see that?</p> <p>16 A Right.</p> <p>17 Q Was your understanding that unless and</p> <p>18 until you paid the fine that you were not eligible</p> <p>19 to renew your license at the United Inn and Suites?</p> <p>20 A Yes, I understand.</p> <p>21 Q In other words, the hotel could not</p> <p>22 continue to do business with a business license</p> <p>23 unless it paid the fines --</p> <p>24 A Yes.</p> <p>25 Q -- from DeKalb County?</p>	<p style="text-align: right;">Page 351</p> <p>1 Bates stamped NBI 2626. Mr. Shareef, this is a</p> <p>2 1099 from 2016 to Rashid Iqbal. Do you see that?</p> <p>3 A Yes.</p> <p>4 Q And it is showing that the payer's name</p> <p>5 is North Brook Industries, Inc., 4649 Memorial</p> <p>6 Drive, correct?</p> <p>7 A Right.</p> <p>8 Q And it is showing the recipient's name</p> <p>9 and address as Rashid Iqbal, 2737 Sheraton Drive,</p> <p>10 Macon, Georgia --</p> <p>11 A Right.</p> <p>12 Q -- right?</p> <p>13 A Right.</p> <p>14 Q Which is the address of the United Inn</p> <p>15 and Suites in Macon, Georgia --</p> <p>16 A Right.</p> <p>17 Q -- right?</p> <p>18 A At that time, yes.</p> <p>19 Q Was Mr. Iqbal working at the United Inn</p> <p>20 and Suites in Macon for some period of time?</p> <p>21 A He may have. He work, you know, both</p> <p>22 property on and off, so he may have work there too.</p> <p>23 Q And was he living at that property for</p> <p>24 some period of time?</p> <p>25 A Which property?</p>

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<p style="text-align: right;">Page 352</p> <p>1 Q At 2737 Sheraton Drive in Macon, Georgia.</p> <p>2 A Yes.</p> <p>3 Q So that was his address?</p> <p>4 A That was his address.</p> <p>5 Q And I assume when he was living at the</p> <p>6 Macon United Inn and Suites, he was working at the</p> <p>7 Macon United Inn and Suites?</p> <p>8 A Right.</p> <p>9 (Plaintiff's Exhibit 19 marked)</p> <p>10 BY MR. BOUCHARD:</p> <p>11 Q I'm showing you Plaintiff's Exhibit 19</p> <p>12 which is NBI 2291. And this is an email,</p> <p>13 Mr. Shareef, from you to a couple of different</p> <p>14 Gmail addresses. And the subject of the email</p> <p>15 concerns a 1099 for Rashid Iqbal. Do you see that?</p> <p>16 A Yes.</p> <p>17 Q And it asks for somebody to make a 1099</p> <p>18 for \$7,000 from Northbrook Industry, Inc. for</p> <p>19 Rashid Iqbal.</p> <p>20 A Right.</p> <p>21 Q Do you see that?</p> <p>22 A Right.</p> <p>23 Q And he's still listed as being at 2737</p> <p>24 Sheraton Drive?</p> <p>25 A Yes.</p>	<p style="text-align: right;">Page 354</p> <p>1 BY MR. BOUCHARD:</p> <p>2 Q I'm showing you Plaintiff's Exhibit 20</p> <p>3 which is Bates stamped NBI 2464 and 2465. This is</p> <p>4 a --</p> <p>5 A Oh, okay.</p> <p>6 Q -- 2017 1099 --</p> <p>7 A Yeah.</p> <p>8 Q -- to Ms. McMillan. Who is that, sir?</p> <p>9 A That's like one of the housekeeper.</p> <p>10 Q One of the housekeepers at 2737 Sheraton?</p> <p>11 A No. She work over there on and off also</p> <p>12 on the other property for maybe, you know, this</p> <p>13 year she work here.</p> <p>14 Q And I'm focused on 2017.</p> <p>15 A Yeah.</p> <p>16 Q She would have been at both or she would</p> <p>17 have been there?</p> <p>18 A No, she must have been here at the</p> <p>19 Decatur, 4649.</p> <p>20 Q So why is her address 2737 Sheraton, was</p> <p>21 she living at the hotel?</p> <p>22 A She living, yeah, I provide them the</p> <p>23 housing.</p> <p>24 Q When she was living at the hotel in</p> <p>25 Macon, I assume that's where she was working?</p>
<p style="text-align: right;">Page 353</p> <p>1 Q And that's the United Inn and Suites in</p> <p>2 Macon?</p> <p>3 A Right.</p> <p>4 Q Who is this email to?</p> <p>5 A This is the CPA.</p> <p>6 Q Is that hnis --</p> <p>7 A Yes.</p> <p>8 Q -- mail?</p> <p>9 A Yes.</p> <p>10 Q And who is saad4649?</p> <p>11 A This is the gentleman that worked for me</p> <p>12 at the 2737, you know, United Inn and Suites in</p> <p>13 Macon.</p> <p>14 Q Who is that? What was his name?</p> <p>15 A Saad, Saad Iqbal.</p> <p>16 Q Related to Rashid or unrelated?</p> <p>17 A Yeah, related.</p> <p>18 Q What was the relation?</p> <p>19 A He's -- Saad is the son of Rashid Iqbal.</p> <p>20 Q Mr. Shareef, who is Brenda McMillan?</p> <p>21 A I don't know.</p> <p>22 Q You do not know?</p> <p>23 A No.</p> <p>24 (Plaintiff's Exhibit 20 marked)</p> <p>25</p>	<p style="text-align: right;">Page 355</p> <p>1 A Yeah. Yeah.</p> <p>2 (Plaintiff's Exhibit 21 marked)</p> <p>3 BY MR. BOUCHARD:</p> <p>4 Q This is Plaintiff's Exhibit 21,</p> <p>5 Mr. Shareef, Bates stamped NBI 2416. And this is a</p> <p>6 2018 1099, so a 1099 for the next year --</p> <p>7 A Yeah.</p> <p>8 Q -- for Ms. McMillan.</p> <p>9 A Right.</p> <p>10 Q Do you see that?</p> <p>11 A Yeah.</p> <p>12 Q And her address is listed again as 2737</p> <p>13 Sheraton Drive, correct?</p> <p>14 A Right.</p> <p>15 Q And the payer is identified as Northbrook</p> <p>16 Industries, Inc., correct?</p> <p>17 A Right.</p> <p>18 Q Was she working at this time for the</p> <p>19 United Inn in Macon?</p> <p>20 A No. She must have been working here.</p> <p>21 Q Well, why is her address -- she was</p> <p>22 living at the Macon --</p> <p>23 A Yeah.</p> <p>24 Q -- United Inn?</p> <p>25 A Her family live over there.</p>

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<p style="text-align: right;">Page 356</p> <p>1 Q And so when she was living there, I</p> <p>2 assume she was working at the hotel where --</p> <p>3 A Yeah.</p> <p>4 Q -- she was living?</p> <p>5 A I mean specifically she works in Macon</p> <p>6 property. And when I need her here, I provide a</p> <p>7 room to her here and she just live here. But she</p> <p>8 can go back and forth, you know, on the weekend to</p> <p>9 her apartment there. But I provide apartment here</p> <p>10 also when we need it.</p> <p>11 Q She would be working at both properties?</p> <p>12 A I don't know. Maybe but looks like she</p> <p>13 work more here, you know.</p> <p>14 Q Why are you saying that? Why are you</p> <p>15 saying it looks like she worked more here?</p> <p>16 A Because I remember because all these, the</p> <p>17 DeKalb County cleanup and tickets problem, I bring</p> <p>18 few more people, you know, to work here at 4649</p> <p>19 Memorial Drive. And Rashid Iqbal and Brenda, they</p> <p>20 are, you know, those people.</p> <p>21 Q You brought them from Macon?</p> <p>22 A From Macon, yes.</p> <p>23 Q When I talked with you in February,</p> <p>24 Mr. Shareef, you had said that you thought there</p> <p>25 was a written partnership agreement between you and</p>	<p style="text-align: right;">Page 358</p> <p>1 A How to explain it. If something happened</p> <p>2 to the loan, I am responsible.</p> <p>3 Q He did not sign the documentation?</p> <p>4 A With the Quantum, yes.</p> <p>5 Q You did but he did not?</p> <p>6 A That's right.</p> <p>7 Q Do you understand it to be that you are</p> <p>8 personally responsible if something happened with</p> <p>9 the loan?</p> <p>10 A Do I understand that? Yes.</p> <p>11 (Plaintiff's Exhibit 22 marked)</p> <p>12 BY MR. BOUCHARD:</p> <p>13 Q I'm showing you Plaintiff's Exhibit 22</p> <p>14 which is 1099s for Mr. Sabharwal from 2017 and</p> <p>15 2018. Do you see that?</p> <p>16 A Yes.</p> <p>17 MR. UNDERRINER: Are these two separate</p> <p>18 exhibits?</p> <p>19 MR. BOUCHARD: No. They're going to be</p> <p>20 joint just for the sake of efficiency.</p> <p>21 BY MR. BOUCHARD:</p> <p>22 Q So these are Plaintiff's Exhibit 22,</p> <p>23 NBI 2473 and NBI 942. And Mr. Shareef, correct me</p> <p>24 if I'm wrong, but were these 1099s reflecting</p> <p>25 compensation that Mr. Sabharwal received as a</p>
<p style="text-align: right;">Page 357</p> <p>1 Mr. Sabharwal. I have not seen that in the</p> <p>2 documents produced. Do you know why that would be?</p> <p>3 A I have -- what I find, the only thing I</p> <p>4 find is our State-provided document. The other one</p> <p>5 I could not find it. But there's an agreement, you</p> <p>6 know, I see one page agreement somewhere. He's</p> <p>7 19 percent and I'm 81 percent.</p> <p>8 Q You believe there's a document that sets</p> <p>9 forth that you are an 81 percent owner and he's a</p> <p>10 19 percent owner?</p> <p>11 A Yeah. I remember, yeah, when we take the</p> <p>12 loan from Quantum and he was not part of the loan,</p> <p>13 so this was the share changes at that time.</p> <p>14 Q But you cannot find that document?</p> <p>15 A I don't have it. Yes, I cannot find it.</p> <p>16 Q When you say he was not part of the loan</p> <p>17 from Quantum, what do you mean?</p> <p>18 A The loan on the Quantum Bank with the</p> <p>19 United Inn and Suite, 4649 Memorial Drive, I'm the</p> <p>20 sole loan on, something like that.</p> <p>21 Q When you say --</p> <p>22 A The loan is --</p> <p>23 Q -- he's not on it --</p> <p>24 A -- in my name.</p> <p>25 Q -- what do you mean?</p>	<p style="text-align: right;">Page 359</p> <p>1 19 percent owner?</p> <p>2 A Yes.</p> <p>3 Q Is that what the 42,000 --</p> <p>4 A Right.</p> <p>5 Q -- reflects?</p> <p>6 A Right.</p> <p>7 Q It is the same amount both years. Is</p> <p>8 that a guaranteed amount?</p> <p>9 A I think so.</p> <p>10 Q Do you know what Gold Coast Properties</p> <p>11 is?</p> <p>12 A That's the same person.</p> <p>13 Q What is that?</p> <p>14 A Mr. Sabharwal.</p> <p>15 Q Is that a real estate company that he</p> <p>16 owns or something?</p> <p>17 A I don't know. He has something like</p> <p>18 that. I recall the name.</p> <p>19 Q Are you involved with it?</p> <p>20 A Gold Coast Property?</p> <p>21 Q Correct.</p> <p>22 A No.</p> <p>23 (Plaintiff's Exhibit 23 marked)</p> <p>24 BY MR. BOUCHARD:</p> <p>25 Q This is Plaintiff's Exhibit 23, NBI 2461.</p>

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<p style="text-align: right;">Page 360</p> <p>1 And it is an email from Habib Ismail to I believe</p> <p>2 you, Mr. Shareef. And it says Gold Coast zero</p> <p>3 amount and Sabharwal, Rashid and Brenda 1099. Do</p> <p>4 you see that?</p> <p>5 A Okay. Yes.</p> <p>6 Q Do you know what that's referring to?</p> <p>7 A I don't know. Maybe I'm reminding him to</p> <p>8 send the 1099s. I don't know.</p> <p>9 Q What did you say?</p> <p>10 A Maybe I was reminding him to send the</p> <p>11 1099 or something like that.</p> <p>12 (Plaintiff's Exhibit 24 marked)</p> <p>13 BY MR. BOUCHARD:</p> <p>14 Q Showing you Plaintiff's Exhibit 24 which</p> <p>15 is NBI 2403. And this is a what appears to me to</p> <p>16 be some sort of pay chart from August 13th, 2018 to</p> <p>17 August 26th, 2018. Do you see that?</p> <p>18 A Yes.</p> <p>19 Q Who are the people listed in the</p> <p>20 left-hand column?</p> <p>21 A These are the people work in the</p> <p>22 housekeeping and front desk.</p> <p>23 Q Where?</p> <p>24 A At the 4649 Memorial Drive.</p> <p>25 Q Do any of them during that time also work</p>	<p style="text-align: right;">Page 362</p> <p>1 Q Is Jessie related to Corita?</p> <p>2 A Yes.</p> <p>3 Q Are they husband and wife?</p> <p>4 A Yes.</p> <p>5 Q What does Jessie do?</p> <p>6 A He sometime do maintenance.</p> <p>7 Q What does Corita do?</p> <p>8 A Front desk.</p> <p>9 Q What about Beatris?</p> <p>10 A Beatris is housekeeping.</p> <p>11 Q What's her last name?</p> <p>12 A I don't know.</p> <p>13 Q What about Jorge, what's his last name?</p> <p>14 A I don't know.</p> <p>15 Q Mireya?</p> <p>16 A Jorge. Which one is Jorge?</p> <p>17 MR. UNDERRINER: It may be George.</p> <p>18 A Oh, George. I'm sorry, George. Jorge.</p> <p>19 BY MR. BOUCHARD:</p> <p>20 Q That's okay.</p> <p>21 A George Nunus, N-U-N-U-S.</p> <p>22 Q What's his job?</p> <p>23 A He work at the front desk.</p> <p>24 Q What about Mireya?</p> <p>25 A That's the housekeeping.</p>
<p style="text-align: right;">Page 361</p> <p>1 at 2737?</p> <p>2 A No.</p> <p>3 Q None of them did?</p> <p>4 A No. No.</p> <p>5 Q I did not recognize all of these names</p> <p>6 and don't believe that all of these folks are</p> <p>7 listed in discovery materials that we have gotten</p> <p>8 in this case. Can you help me out with who some of</p> <p>9 these people are. For example, Tony with two</p> <p>10 asterisks next to his name, it says he worked 80</p> <p>11 hours.</p> <p>12 A Yes. One of the housekeeper. I think I</p> <p>13 send the list. I list these names. I think I</p> <p>14 listed these names in one of the report and they</p> <p>15 send it to you.</p> <p>16 Q Is he a housekeeper at the United Inn?</p> <p>17 A Oh, the -- who?</p> <p>18 Q Tony.</p> <p>19 MS. RICHENS: Tony.</p> <p>20 A Yeah, housekeeping.</p> <p>21 BY MR. BOUCHARD:</p> <p>22 Q What's his last name?</p> <p>23 A Tony's name? Singh. Singh. S-I-N-G-H.</p> <p>24 Q What about Jesse?</p> <p>25 A Jessie Graham, G-R-A-M. G-R-A-H-A-M.</p>	<p style="text-align: right;">Page 363</p> <p>1 Q And what's her last name?</p> <p>2 A Maria Betris, B-E-T-R-I-S.</p> <p>3 Q Sam, who's that?</p> <p>4 A He could be a groundsman.</p> <p>5 Q Do you know last name?</p> <p>6 A No.</p> <p>7 Q What about Reyna?</p> <p>8 A Reyna Ray, R-A-Y, Ray, Reyna Ray,</p> <p>9 housekeeping.</p> <p>10 Q And Bilal?</p> <p>11 A Front desk.</p> <p>12 Q Last name?</p> <p>13 A A-H-M-A-D.</p> <p>14 Q Ahmad?</p> <p>15 A Ahmad, yes.</p> <p>16 Q There's also a name towards the top</p> <p>17 Jenoris. Who is that?</p> <p>18 A That's the maintenance guy.</p> <p>19 Q What's his full name, do you know?</p> <p>20 A I don't know. No, I don't know.</p> <p>21 (Plaintiff's Exhibit 25 marked)</p> <p>22 BY MR. BOUCHARD:</p> <p>23 Q I'm showing you Plaintiff's 25 which is</p> <p>24 NBI 2456. Do you see this email, Mr. Shareef?</p> <p>25 A Yes.</p>

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<p style="text-align: right;">Page 364</p> <p>1 Q This concerns a claim it looks like</p> <p>2 pertinent to a matter in which a guest of the</p> <p>3 United Inn was arrested for murder. Do you see</p> <p>4 that?</p> <p>5 A Yes.</p> <p>6 Q Did you have an understanding whether or</p> <p>7 not that murder occurred at the United Inn?</p> <p>8 A I don't know.</p> <p>9 Q Do you recall there being a murder at the</p> <p>10 United Inn in 2018?</p> <p>11 A I don't know.</p> <p>12 Q How many murders have there been at the</p> <p>13 motel since you have been affiliated with the</p> <p>14 hotel?</p> <p>15 A One.</p> <p>16 Q And you cannot recall if that was in</p> <p>17 2018?</p> <p>18 A No, I don't. Matter of fact, I went to</p> <p>19 most of the hearing with the FBI. But I just don't</p> <p>20 know.</p> <p>21 (Plaintiff's Exhibit 26 marked)</p> <p>22 BY MR. BOUCHARD:</p> <p>23 Q This is Plaintiff's Exhibit 26 which is</p> <p>24 NBI 2459. And this is an email from you to looks</p> <p>25 like your insurance broker --</p>	<p style="text-align: right;">Page 366</p> <p>1 girlfriend -- no, the boyfriend kill her, something</p> <p>2 like that.</p> <p>3 Q And then the second incident reported</p> <p>4 here is on May 5th, guest died in room 325. Do you</p> <p>5 see that?</p> <p>6 A Yes.</p> <p>7 Q Do you know the circumstances of that</p> <p>8 death, what happened?</p> <p>9 A I guess that was -- 325. I guess that</p> <p>10 was -- I remember send -- the housekeeper reported</p> <p>11 to me that, you know, there's a smell. And when we</p> <p>12 send the police there, find the dead people.</p> <p>13 Because that was the checkout date. I remember,</p> <p>14 yes, vaguely. That was the checkout date, so we</p> <p>15 find out he was died maybe two days prior to that</p> <p>16 date, something like that.</p> <p>17 Q Do you know if it was a drug overdose? A</p> <p>18 result of violence? Something else?</p> <p>19 A I don't know.</p> <p>20 Q How often does housekeeping come into the</p> <p>21 rooms?</p> <p>22 A For the weekly room, people pay weekly,</p> <p>23 they go once a week. And if somebody is paying</p> <p>24 daily, we go every day.</p> <p>25 Q Would that have been true 2017 to 2019?</p>
<p style="text-align: right;">Page 365</p> <p>1 A Yes.</p> <p>2 Q -- is that right?</p> <p>3 A Yeah.</p> <p>4 Q And you're reporting two incidents at the</p> <p>5 property; is that right?</p> <p>6 A Yeah, I send this to my insurance agent.</p> <p>7 Q And it concerns two incidents at the</p> <p>8 property you say; is that right?</p> <p>9 A Yes.</p> <p>10 Q It says that one of the incidents</p> <p>11 pertains to a murder at the property; is that</p> <p>12 right?</p> <p>13 A Yes.</p> <p>14 Q Is that the murder that you were</p> <p>15 referring to?</p> <p>16 A Yes.</p> <p>17 Q And --</p> <p>18 A I don't know. I don't think so, no.</p> <p>19 This is another one. Yeah.</p> <p>20 Q This is a different one?</p> <p>21 A That one the person find dead in the</p> <p>22 room.</p> <p>23 Q Find what?</p> <p>24 A The one I was talking about, that person</p> <p>25 was dead in the room. Later on we find out the</p>	<p style="text-align: right;">Page 367</p> <p>1 A Yeah.</p> <p>2 Q Would that have been true --</p> <p>3 A Yes.</p> <p>4 Q -- for the years --</p> <p>5 A Yes.</p> <p>6 Q -- 2017 to 2019?</p> <p>7 A Yes.</p> <p>8 MS. RICHENS: Can we take a break, David?</p> <p>9 MR. BOUCHARD: Sure.</p> <p>10 THE VIDEOGRAPHER: Off the record at</p> <p>11 3:45 p.m.</p> <p>12 (Recess 3:45-3:58 p.m.)</p> <p>13 THE VIDEOGRAPHER: Back on the record at</p> <p>14 3:58 p.m.</p> <p>15 (Plaintiff's Exhibit 27 marked)</p> <p>16 BY MR. BOUCHARD:</p> <p>17 Q Mr. Shareef, I'm handing you Plaintiff's</p> <p>18 Exhibit 27 which is Bates stamped NBI 4060 through</p> <p>19 4081. And I understand these to be text messages</p> <p>20 between you and Mr. Weber, Sergeant Weber; is that</p> <p>21 correct?</p> <p>22 A Yes.</p> <p>23 Q Would you like to have a chance to review</p> <p>24 them?</p> <p>25 A Yes.</p>

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<p style="text-align: right;">Page 368</p> <p>1 Q Have you had a chance to review them?</p> <p>2 A I see them.</p> <p>3 Q Is this the total set of your text</p> <p>4 messages with Mr. Weber?</p> <p>5 A Yes.</p> <p>6 Q So all of your communications by text</p> <p>7 message with Mr. Weber from 2017 to 2019 are</p> <p>8 reflected here?</p> <p>9 A Yes.</p> <p>10 Q All right. If you look at page NBI 4061,</p> <p>11 which is the second page, if you sent</p> <p>12 Sergeant Weber a photo, that's what it would look</p> <p>13 like, right?</p> <p>14 A Yeah.</p> <p>15 Q If you flip the page to 4062. And you</p> <p>16 asked on May 4th, 2017 for information about the</p> <p>17 shooting in 142. Do you see that on 5/4/2017?</p> <p>18 A Yes.</p> <p>19 Q And the first thing I wanted to ask you</p> <p>20 was the date there is May 4th, 2017. Do you see</p> <p>21 that?</p> <p>22 A Yes.</p> <p>23 Q The date above that is January 29th,</p> <p>24 2017.</p> <p>25 Do you see that?</p>	<p style="text-align: right;">Page 370</p> <p>1 A After looking at the messages, yes.</p> <p>2 Q What was the circumstances of that</p> <p>3 shooting?</p> <p>4 A I don't know. But I believe I heard,</p> <p>5 because I'm almost above this room, and I heard,</p> <p>6 you know, few gunfire. And we call and also the</p> <p>7 911. And then I send him a message because I</p> <p>8 didn't see him there. Because I know he's coming</p> <p>9 with the next, you know, hour, two hour, so I asked</p> <p>10 him to check it. And he came and -- I think he</p> <p>11 came to the property. And then he called the</p> <p>12 police officer and I think he talked with them.</p> <p>13 Q And concluded that it was prostitution</p> <p>14 related?</p> <p>15 A I am not hundred percent.</p> <p>16 Q Well, look at page NBI 4063, please,</p> <p>17 where it says at the top: So far all I know is</p> <p>18 that it was prostitution related.</p> <p>19 Do you see that?</p> <p>20 A Yeah.</p> <p>21 Q Do you agree it appears that he concluded</p> <p>22 the shooting was related to prostitution in room</p> <p>23 142?</p> <p>24 A Looking at the messages, yes, he</p> <p>25 concluded that way.</p>
<p style="text-align: right;">Page 369</p> <p>1 A Yes.</p> <p>2 Q So does that mean that you didn't</p> <p>3 exchange any texts for the entire month of</p> <p>4 February, March, April with Sergeant Weber?</p> <p>5 A I guess you're right.</p> <p>6 Q So about 90 days plus you did not send or</p> <p>7 receive any text messages from Sergeant Weber; is</p> <p>8 that right?</p> <p>9 A Right.</p> <p>10 Q And I think you had told me that</p> <p>11 Sergeant Weber would not prepare reports</p> <p>12 documenting what he had done on his shift; is that</p> <p>13 right?</p> <p>14 A Right.</p> <p>15 Q He would not submit any written</p> <p>16 documentation to you?</p> <p>17 A No.</p> <p>18 Q Or to the hotel?</p> <p>19 A No.</p> <p>20 Q And so unless there's a text message,</p> <p>21 there's nothing in writing from him to you or the</p> <p>22 hotel about his shift; is that right?</p> <p>23 A Right.</p> <p>24 Q Do you recall a shooting in room 142 in</p> <p>25 May 2017?</p>	<p style="text-align: right;">Page 371</p> <p>1 Q Do you have any further understanding of</p> <p>2 what caused that shooting in room 142?</p> <p>3 A No. When he take over, then at the end</p> <p>4 he just, you know, if we meet, he give me the</p> <p>5 report what's going on or he send a message, you</p> <p>6 know, this is what happened.</p> <p>7 Q It looks like your next text message with</p> <p>8 him is a month later on June 4th; is that right?</p> <p>9 A June 4th, yeah.</p> <p>10 Q So it looks like about 30 days pass</p> <p>11 before you have any further written</p> <p>12 correspondence --</p> <p>13 A Right.</p> <p>14 Q -- with him?</p> <p>15 A Right.</p> <p>16 Q So you don't send him any messages about</p> <p>17 what steps are you taking to try to prevent</p> <p>18 commercial sex activity on the property; is that</p> <p>19 right?</p> <p>20 A No, I don't send him that. We talk about</p> <p>21 it because we meet quite often, you know. And</p> <p>22 that's the year when I need to stay there and fix</p> <p>23 those violations, so I was there, you know, more</p> <p>24 and I see him or other officer.</p> <p>25 Q Were you not there as much in 2016?</p>

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<p style="text-align: right;">Page 372</p> <p>1 A Maybe not. I don't know.</p> <p>2 Q You do not know?</p> <p>3 A I do not know.</p> <p>4 Q Well, what do you mean when you're saying</p> <p>5 you had to be there more in 2017?</p> <p>6 A Because the working on those violations,</p> <p>7 so I have a bunch of people, you know, working</p> <p>8 there and I have to be with them fixing the</p> <p>9 violations from the city code enforcement.</p> <p>10 Q Did you increase the amount of time you</p> <p>11 were spending at the hotel based on the code</p> <p>12 violations?</p> <p>13 A Definitely I did.</p> <p>14 Q And you spent less time in Jacksonville</p> <p>15 or in Macon?</p> <p>16 A Both.</p> <p>17 Q You were spending more time on Memorial</p> <p>18 Drive --</p> <p>19 A Those days.</p> <p>20 Q -- because of the code violations?</p> <p>21 A Yes.</p> <p>22 Q Who would be in charge at United Inn when</p> <p>23 you were not there, was it Mr. Islam?</p> <p>24 A Yes.</p> <p>25 Q And anybody else or solely Mr. Islam?</p>	<p style="text-align: right;">Page 374</p> <p>1 was a lot of traffic to the room?</p> <p>2 A I don't recall. But it could be</p> <p>3 anything, you know.</p> <p>4 Q Could be anything at 12:40 --</p> <p>5 A Meaning they, you know, they said we are</p> <p>6 having a birthday or something like that, you know.</p> <p>7 Q And then on NBI 4065 Weber sends you some</p> <p>8 driver's licenses via text to add to the criminal</p> <p>9 trespass paperwork; is that right?</p> <p>10 A Yes.</p> <p>11 Q If you look through these text messages,</p> <p>12 Mr. Shareef, you didn't send the BOLO notice that</p> <p>13 we talked about showing a photo of 16-year-old J.G.</p> <p>14 to Sergeant Weber, did you?</p> <p>15 A No.</p> <p>16 Q Then if you look at page NBI 4066, it</p> <p>17 says he was actually here. If you look at</p> <p>18 April 7th, 2018, there's a message from Weber. And</p> <p>19 it says he was actually here to buy sexual</p> <p>20 relations from the lady in room 127. She came</p> <p>21 outside and spoke with me.</p> <p>22 Do you see that?</p> <p>23 A Yes.</p> <p>24 Q Do you recall that incident?</p> <p>25 A Not on top of my head.</p>
<p style="text-align: right;">Page 373</p> <p>1 A Mr. Islam.</p> <p>2 Q And he does not live at the property,</p> <p>3 right?</p> <p>4 A No.</p> <p>5 Q So when he's not -- when he goes home at</p> <p>6 the end of his shift, that means he's not at the</p> <p>7 property?</p> <p>8 A He's not at the property.</p> <p>9 Q And that was true 2017 through 2019, that</p> <p>10 is he didn't --</p> <p>11 A Yes.</p> <p>12 Q -- live at the property during those</p> <p>13 years?</p> <p>14 A Right.</p> <p>15 Q And then there's a text from you on</p> <p>16 October 19th, 2017, which is on page NBI 4064, at</p> <p>17 12:40 in the morning. And you say, quote, lots of</p> <p>18 traffic. And you said a minute before that check</p> <p>19 room 129.</p> <p>20 Do you see that?</p> <p>21 A Yes.</p> <p>22 Q And Weber says they had loud music. He</p> <p>23 made them turn it off. And they were drunk, right?</p> <p>24 A Yes.</p> <p>25 Q Did you ever get resolution of why there</p>	<p style="text-align: right;">Page 375</p> <p>1 Q About a month after that on May 12th,</p> <p>2 2018 on NBI 4067, on May 12th, 2016, you text</p> <p>3 Sergeant Weber and say someone overdosed in 325.</p> <p>4 Do you see that?</p> <p>5 A Yes.</p> <p>6 Q Do you understand that to be a drug</p> <p>7 overdose or what did you understand that to be?</p> <p>8 A It must be.</p> <p>9 Q When you say they are removing lots of</p> <p>10 rooms, what do you mean by that?</p> <p>11 A I recall there are a lot of -- you know,</p> <p>12 when we call the, you know, police and if I'm</p> <p>13 recalling, they had some specific smell. And they</p> <p>14 said before we go there, you know, they need to</p> <p>15 empty the rooms like two room right, two room left</p> <p>16 or maybe three rooms right, three rooms left, so</p> <p>17 something like that.</p> <p>18 Q They were clearing out other rooms</p> <p>19 because of the smell?</p> <p>20 A Smell or a lot of police officers, there</p> <p>21 must be some reason.</p> <p>22 (Plaintiff's Exhibit 28 marked)</p> <p>23 BY MR. BOUCHARD:</p> <p>24 Q Showing you Plaintiff's Exhibit 28. And</p> <p>25 these are text messages between Mr. Islam and</p>

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<p style="text-align: right;">Page 376</p> <p>1 Mr. Weber, at least I believe they are. Did you 2 have any involvement with Mr. Islam's texts with 3 Mr. Weber? 4 A No. 5 Q I didn't see any text messages in your 6 production between you and Sergeant McClelland. 7 Why would that be? 8 A I don't know. 9 Q Did you text with him? 10 A I text him, yes. I don't know. 11 Q You texted with Sergeant McClelland for 12 the years 2017 through 2019? 13 A I don't know. But I must have. 14 Q Do you think your texts with McClelland 15 are similar to your texts with Weber, same type of 16 texts? 17 A Yeah. But I know I text Weber more than 18 McClelland. 19 Q Why? 20 A Because I feel like McClelland has more 21 authority and he is there, I see him, he's driving 22 around, you know, he's more visible when he's 23 there. So that could be the reason, you know. For 24 some reason I text Weber more because when I don't 25 see him, I text him.</p>	<p style="text-align: right;">Page 378</p> <p>1 Q Have you ever asked McClelland to walk 2 around the property more? 3 A Yeah. 4 Q Is there a reason why McClelland walks 5 around less than Weber? 6 A I don't know. But I just ask him -- 7 maybe I mention him that hey, Weber is a younger 8 person and he like to walk around. But matter of 9 fact, at the same time I told him I like you to -- 10 well, I kind of I feel more, you know, comfortable 11 when I see the lights on and he's there, you know. 12 Maybe I was joking to him or, you know. But I did 13 have this conversation, you know, that Weber is 14 walking more than you. 15 Q Where does McClelland park when you say 16 it is a visible area? 17 A I have -- 18 Q Sorry, just to be clear, focusing on 2017 19 to 2019. I assume -- 20 A Yeah, his habit -- 21 Q -- you understand that? 22 A -- is the same. Yeah, I think his habit, 23 yeah. He park kind of at the end of the property 24 where he can be seen more and he can -- he's 25 usually parked sometime at the front or the back of</p>
<p style="text-align: right;">Page 377</p> <p>1 Q When McClelland is working, you see him 2 more than you see Weber when Weber is working? 3 A Yeah, I feel like it. 4 Q How do you see McClelland more? Does he 5 walk around the property more or he stands 6 somewhere more or ... 7 A Yeah, his habit is he park like a very 8 visible area and turn his lights on. This is his 9 habit. And Weber is a walking guy. Maybe he's 10 like behind the building or upstairs, downstairs. 11 He's a walking guy. 12 Q Are you saying that when McClelland is 13 working, he spends more time in the car and Weber 14 spends -- 15 A Yeah. 16 Q -- more time on foot? 17 A Yeah. He park like one corner, turn the 18 lights on. Park in front, turn the lights on. 19 Q Weber spends less time in the car than 20 McClelland? 21 A Yeah. Weber is walking guy, yes. 22 Q How old is Weber approximately? 23 A Must be early forties. 24 Q How old is McClelland? 25 A Late forties, maybe early fifties.</p>	<p style="text-align: right;">Page 379</p> <p>1 the property. He find one empty parking spot and, 2 you know, park there and have his lights on. 3 Q I'm not sure I understood. Does he park 4 in sort of the same spot every time or does it 5 change? 6 A I mean if the spot is available if nobody 7 is parking, park there. 8 Q So let's say there's nobody there, 9 where's he going to park? What's his typical spot? 10 Is it in the front? Is it in the back? Is it on 11 the side? 12 A On the back side. 13 Q On the back side? 14 A On the back side, yes. 15 Q Is it close to a particular side of the 16 hotel in the back? 17 A It is not close. But I feel like if it 18 is close, then the other people cannot see him, so 19 he's parking there but further so people from the 20 third floor can see him. You know -- 21 Q He's parking -- 22 A -- I think that could be the reason. 23 Q -- further back in the parking lot -- 24 A Further back, yes. 25 Q -- so people can see him?</p>

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<p style="text-align: right;">Page 380</p> <p>1 A Yes.</p> <p>2 Q In the back parking lot --</p> <p>3 A Back parking lot --</p> <p>4 Q -- generally?</p> <p>5 A -- yes.</p> <p>6 Q What about Weber, is he generally in the</p> <p>7 back or the front?</p> <p>8 A He is -- I see him, he is -- he park</p> <p>9 always at the front.</p> <p>10 Q He always parks in the front?</p> <p>11 A Almost always, yes.</p> <p>12 Q Do you know why they do it differently?</p> <p>13 A I don't know.</p> <p>14 Q It is not something you have asked for?</p> <p>15 A No.</p> <p>16 Q They do that on their own?</p> <p>17 A Yeah.</p> <p>18 Q Mr. Shareef, when we talked in February I</p> <p>19 had asked you about background checks of employees</p> <p>20 at the United Inn and Suites. I have not seen any</p> <p>21 documents in your production showing background</p> <p>22 checks on employees or workers or laborers or</p> <p>23 independent contractors at the hotel. I assume</p> <p>24 that means there is no such documentation of</p> <p>25 background checks?</p>	<p style="text-align: right;">Page 382</p> <p>1 you handwrite them and somebody typed this for you?</p> <p>2 A No. No. They gave us the -- I believe</p> <p>3 they gave us some links, you know, click on these</p> <p>4 links and go to certain website. And some of them</p> <p>5 I think they give them to us there and I retype it.</p> <p>6 Because there are -- on those notes I see there's</p> <p>7 lot of things repeated, so I type my basically own</p> <p>8 notes plus some of the notes coming from the</p> <p>9 websites.</p> <p>10 Q And you're saying that you think you</p> <p>11 attended meetings related to the DeKalb County Code</p> <p>12 Enforcement?</p> <p>13 A There was a meeting, you know,</p> <p>14 collaboration with the Code Enforcement and the</p> <p>15 Tourism, DeKalb County Tourism Department.</p> <p>16 Q Was this relating to the DeKalb County</p> <p>17 Hotel, Motel Ordinance in 2017?</p> <p>18 A Yes.</p> <p>19 Q DeKalb County hosted meetings for DeKalb</p> <p>20 hotel owners and operators to attend --</p> <p>21 A Right.</p> <p>22 Q -- to talk about the ordinance?</p> <p>23 A Yes.</p> <p>24 Q And at those meetings, is it more than</p> <p>25 one meeting or just one meeting?</p>
<p style="text-align: right;">Page 381</p> <p>1 A Well, I don't know. I couldn't find</p> <p>2 anything.</p> <p>3 (Plaintiff's Exhibit 29 marked)</p> <p>4 BY MR. BOUCHARD:</p> <p>5 Q Mr. Shareef, I'm showing you Plaintiff's</p> <p>6 Exhibit 29, and this is Bates stamped NBI 625 to</p> <p>7 NBI 631.</p> <p>8 Do you see that?</p> <p>9 A Yes.</p> <p>10 Q This appears to be a compilation of</p> <p>11 documents and articles, but it was produced to us,</p> <p>12 the Plaintiffs, by Northbrook Industries, Inc. So</p> <p>13 can you tell me what this is, what these series of</p> <p>14 documents are about human trafficking.</p> <p>15 A Yeah. These are like I think -- I'm not</p> <p>16 sure which -- what date but this is almost</p> <p>17 happening on the -- when we got these violations</p> <p>18 and we have few meetings with the DeKalb County</p> <p>19 Police and the county Tourism Department. And they</p> <p>20 have some of the material given to us and then some</p> <p>21 of the links, website they give it to us to read</p> <p>22 the material and share with the staff. So this is</p> <p>23 what I -- this is kind of my notes I can say.</p> <p>24 Q Help me understand that. Did you bring a</p> <p>25 computer and you typed these notes yourself or did</p>	<p style="text-align: right;">Page 383</p> <p>1 A I attend maybe two meetings.</p> <p>2 Q At those meetings at least one of the</p> <p>3 topics was the ordinance for the hotels --</p> <p>4 A Right. Right.</p> <p>5 Q -- in DeKalb County --</p> <p>6 A Uh-huh (affirmative).</p> <p>7 Q -- that the DeKalb County commission was</p> <p>8 talking about passing?</p> <p>9 A Right.</p> <p>10 Q And another topic was human trafficking?</p> <p>11 A Yes.</p> <p>12 Q Were there other topics at these</p> <p>13 meetings?</p> <p>14 A Other topics are how to go into their --</p> <p>15 in their website, register yourself, you can get</p> <p>16 more customers so they can expose you with the</p> <p>17 other events in the DeKalb County so you can find</p> <p>18 groups coming from the other cities to have their</p> <p>19 family gathering or whatever their visit, visitors</p> <p>20 who are contacting them. So it is basically</p> <p>21 helpful to find more customers, so these are the</p> <p>22 topics there.</p> <p>23 Q The DeKalb County Tourism Department was</p> <p>24 trying to help hotels develop business?</p> <p>25 A More business, yes.</p>

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<p style="text-align: right;">Page 384</p> <p>1 Q Generate ideas on how to develop 2 business? 3 A That's right. That's right. 4 Q So looking at NBI 625 and 626 of 5 Plaintiff's Exhibit 29, are these things that you 6 would have typed, Mr. Shareef, or things that you 7 would have written after your research? 8 A Yes, I can say that. 9 Q So you put this together? 10 A I put this together. 11 Q It is not as if somebody at the meeting 12 with DeKalb County said here you go, Mr. Shareef, 13 this is our handout at the meeting today? 14 A No. I mean I basically got the 15 information from there. 16 Q Right. 17 A You know, if I don't find because those 18 handouts have the websites, so when you go to the 19 website, it is easier for me because I'm not a very 20 good writer, so it is good for me to just to 21 collect a paragraph and bring it for my file. 22 Q So you could copy-paste? 23 A Yeah, that's the right word. 24 Q And so did you take information you got 25 at some of these meetings and go back to the hotel</p>	<p style="text-align: right;">Page 386</p> <p>1 A Yes. 2 Q And it said: This guide by End Sex 3 Trafficking includes information on spotting the 4 signs that kids are being trafficked, safety 5 measures for adults and children to take, and basic 6 information about sex trafficking. 7 Do you see that? 8 A Yes. 9 Q And if you flip the page, Mr. Shareef, 10 there's on page NBI 626 there's high school aged 11 lesson plans listed, college level lesson plans 12 listed. 13 Do you see that? 14 A Yes. 15 Q And you put this together, I did not, so 16 tell me if I'm wrong. But what I understand this 17 to be is a list of educational materials about 18 human trafficking -- 19 A Right. 20 Q -- is that correct? 21 A Yes. 22 Q And for example it says at the top of 23 page 2: Reporting options if you suspect a youth 24 is affected by human trafficking or being 25 exploited.</p>
<p style="text-align: right;">Page 385</p> <p>1 and do research -- 2 A Yes. 3 Q -- at the hotel? 4 A Yes. 5 Q Where would you have kept this? Do you 6 have a computer at the hotel that you would have 7 saved this on or a hard copy file? 8 A This is the computer at the hotel, we use 9 it for the front desk. 10 Q So that's the computer -- 11 A Yeah. 12 Q -- it would have been saved on? 13 A Yes. Yes. 14 Q And the ordinance in DeKalb County, which 15 we'll take a look at in a minute, but I can 16 represent to you it was passed in 2017. Does that 17 sound right to you? 18 A Yes. 19 Q Is that when the meetings occurred that 20 you're referencing in 2017? 21 A Yes. 22 Q If you look at halfway down NBI 625, 23 there's a bullet point that says Guide, quote, how 24 to talk to kids about sex trafficking, end quote. 25 Do you see that?</p>	<p style="text-align: right;">Page 387</p> <p>1 Do you see that? 2 A Yes. 3 Q If you flip to page NBI 627, which is 4 about halfway through Plaintiff's 29, it says the 5 role of business. 6 Do you see that? 7 A Yes. 8 Q And in the second sentence it says: More 9 importantly they, and it is referring to 10 businesses, can take action to root out human 11 trafficking in their own supply chains. 12 Do you see that? 13 A Yes. 14 Q Did you prepare this document or where 15 did this document come from, Mr. Shareef? 16 A This is, again, this is the -- like on 17 page 26, if you go to -- I'm just giving you an 18 example -- it goes to where it says kids are not 19 for sale, the price of human trafficking lesson 20 plan by the American Federation of Teachers. So 21 when you click there, you find some things which 22 you can use for your business. So this is maybe I 23 get it from there. 24 Q So you think this is not something that 25 you wrote, you think this is something you got from</p>

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<p style="text-align: right;">Page 388</p> <p>1 another website --</p> <p>2 A That's right.</p> <p>3 Q -- on 627?</p> <p>4 A That's right. That's right.</p> <p>5 Q And is 627, this document that we're</p> <p>6 looking at on NBI 627, is this something that was</p> <p>7 saved on the computer at the front desk at the</p> <p>8 United Inn?</p> <p>9 A It must be.</p> <p>10 Q Or what I am trying to figure out is is</p> <p>11 it something that you would have printed off and</p> <p>12 kept in a hard copy file in your filing cabinet in</p> <p>13 the office?</p> <p>14 A No. Bunch of copy of these, I have these</p> <p>15 copies, maybe four or five of them, you know. And</p> <p>16 I did have a conversation, you know, with the Weber</p> <p>17 that hey, this is the one I got and I kind of</p> <p>18 gathered some information, you know, anything which</p> <p>19 don't look appropriate or maybe repeat of something</p> <p>20 so we take it out. So but basically this is maybe</p> <p>21 I have couple of copies over there.</p> <p>22 Q Where would you keep the copies, in your</p> <p>23 filing cabinet?</p> <p>24 A No. It is one of the file at the front</p> <p>25 desk. I don't know. But one of the file it says,</p>	<p style="text-align: right;">Page 390</p> <p>1 information to?</p> <p>2 A I don't recall, you know, when I change</p> <p>3 what last time.</p> <p>4 Q On NBI 628 it says -- it looks to be an</p> <p>5 article as best I can tell, but maybe you can tell</p> <p>6 me what's on NBI 628. It goes on to NBI 629.</p> <p>7 A So what is the question?</p> <p>8 Q Is this an article or is this something</p> <p>9 that you wrote?</p> <p>10 A It must be article.</p> <p>11 Q Do you know where it came from?</p> <p>12 A No.</p> <p>13 Q Do you know when you found it?</p> <p>14 A No.</p> <p>15 Q And let me just ask the same question.</p> <p>16 Do you know when you pulled these notes together?</p> <p>17 You said that you thought it was related to the</p> <p>18 DeKalb County meetings. But do you know when?</p> <p>19 A I guess on and off. I mean 2017 and then</p> <p>20 maybe I add, like I said, you know, paragraph here</p> <p>21 and there from those websites.</p> <p>22 Q So on NBI 628 in that article, the first</p> <p>23 bolded sentence says: Hotels and motels are one of</p> <p>24 the locations where sex trafficking is known to</p> <p>25 occur at higher rates.</p>
<p style="text-align: right;">Page 389</p> <p>1 you know, human trafficking.</p> <p>2 Q One of the files says --</p> <p>3 A Yeah.</p> <p>4 Q -- human trafficking?</p> <p>5 A Yeah.</p> <p>6 Q When did you create that file?</p> <p>7 A You know, when we are there for the</p> <p>8 meetings. I think that could be the timing. I</p> <p>9 don't know.</p> <p>10 Q The meetings that you referenced</p> <p>11 previously --</p> <p>12 A Yeah. Yeah.</p> <p>13 Q -- with DeKalb County?</p> <p>14 A Yeah. And maybe we go to the website</p> <p>15 later and then, you know, get some information.</p> <p>16 Q Is this document, it has got -- I don't</p> <p>17 know if these are stand-alone documents or all one</p> <p>18 document. I have combined them as Plaintiff's</p> <p>19 Exhibit 29. Are these documents and pages that you</p> <p>20 would have been kind of adding to over the years?</p> <p>21 A I don't know. But maybe I add a</p> <p>22 paragraph or something. I don't know.</p> <p>23 Q I didn't know if it was something that</p> <p>24 you created years ago and haven't touched since or</p> <p>25 whether it is something you go back to and add</p>	<p style="text-align: right;">Page 391</p> <p>1 Do you see that?</p> <p>2 A Yes.</p> <p>3 Q Do you agree with that?</p> <p>4 A I agree.</p> <p>5 Q And it says in the bottom paragraph on</p> <p>6 the same page: The number one action that tourism</p> <p>7 and travel businesses can't take is creating,</p> <p>8 formally adopting, and enforcing organization wide</p> <p>9 anti-trafficking policies. These policies could</p> <p>10 use the code of conduct for the protection of</p> <p>11 children from sexual exploitation and travel and</p> <p>12 tourism and the United Nations' guiding principles</p> <p>13 on business and human rights as guidelines. These</p> <p>14 policies should include awareness training for</p> <p>15 employees, establish safe mechanisms and protocols</p> <p>16 for reporting human trafficking, and public</p> <p>17 transparency and disclosures about the steps being</p> <p>18 taken to ensure that there is no human trafficking</p> <p>19 in business models.</p> <p>20 Do you see that?</p> <p>21 A Yeah.</p> <p>22 Q Do you agree with that, Mr. Shareef?</p> <p>23 A Yes.</p> <p>24 Q And then the last portion of Plaintiff's</p> <p>25 Exhibit 29 is what looks to be some sort of notice</p>

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<p style="text-align: right;">Page 392</p> <p>1 about a human trafficking awareness campaign by the</p> <p>2 Attorney General Division of Criminal Justice,</p> <p>3 Human Trafficking Task Force.</p> <p>4 Do you see that?</p> <p>5 A The last page you said?</p> <p>6 Q The last two pages.</p> <p>7 A Last two pages. Yes.</p> <p>8 Q And it says underneath that: This course</p> <p>9 is approximately eight hours. It provides basic</p> <p>10 information about how to identify human trafficking</p> <p>11 and/or related activity and is available for free.</p> <p>12 Click here to access through YouTube.</p> <p>13 Do you see that?</p> <p>14 A Yes.</p> <p>15 Q Did you ever take that eight-hour</p> <p>16 training, Mr. Shareef?</p> <p>17 A Not eight-hour training. But I sit on</p> <p>18 the watch -- the YouTube and it has exactly the</p> <p>19 same, you know, information which is here on these</p> <p>20 pages.</p> <p>21 Q I assume your staff did not have to watch</p> <p>22 the eight-hour training?</p> <p>23 A No, I did not -- they did not, no.</p> <p>24 Q I assume your staff did not receive</p> <p>25 copies of these materials; is that correct?</p>	<p style="text-align: right;">Page 394</p> <p>1 A Yes.</p> <p>2 Q And it lists a number of different</p> <p>3 things. One of the items is providing employee</p> <p>4 training to help them understand and identify signs</p> <p>5 of human trafficking, distributing and posting the</p> <p>6 fact sheets in this kit to your employees.</p> <p>7 Do you see that?</p> <p>8 A Yes.</p> <p>9 Q You did not do that, correct?</p> <p>10 A Not on a training session, yes.</p> <p>11 Q And you did not distribute the fact</p> <p>12 sheets in the kit to your employees, right?</p> <p>13 A No, I did not distribute it. But it is</p> <p>14 available, you know.</p> <p>15 Q And it says on page NBI 631 in the middle</p> <p>16 of the page, this is the last page of</p> <p>17 Plaintiff's 29, looking in the middle of the page</p> <p>18 it says: Housekeeping, maintenance, and room</p> <p>19 service staff typically have.</p> <p>20 Do you see where I'm reading from?</p> <p>21 A Yes. Yes.</p> <p>22 Q The most access to guest rooms where</p> <p>23 signs of human trafficking may be apparent. By</p> <p>24 being conscious of human trafficking indicators,</p> <p>25 you can help identify possible human trafficking</p>
<p style="text-align: right;">Page 393</p> <p>1 A I don't know. Not everyone but I don't</p> <p>2 know.</p> <p>3 Q Well, last time in February when we</p> <p>4 talked, my understanding of your testimony --</p> <p>5 correct me if I'm wrong -- was that you did not</p> <p>6 distribute written materials to your staff.</p> <p>7 A Yeah, I mean it is there. But I did not</p> <p>8 have, you know, like a training class like this</p> <p>9 kind of environment.</p> <p>10 Q You did not have a training class?</p> <p>11 A I mean not a training, training class but</p> <p>12 we talk about the bullet point.</p> <p>13 Q It says in the middle section on NBI 630</p> <p>14 about halfway down the paragraph it says: What</p> <p>15 actions can I take at my business to help stop</p> <p>16 human trafficking.</p> <p>17 Do you see that?</p> <p>18 A Yes.</p> <p>19 Q It says: You play a significant role in</p> <p>20 helping to stop this terrible crime by, and the</p> <p>21 first thing listed is knowing the signs of human</p> <p>22 trafficking.</p> <p>23 Do you see that?</p> <p>24 A Uh-huh (affirmative).</p> <p>25 Q Do you agree with that?</p>	<p style="text-align: right;">Page 395</p> <p>1 activities and victims.</p> <p>2 Do you see that?</p> <p>3 A Right.</p> <p>4 Q Do you agree with that statement?</p> <p>5 A Yes.</p> <p>6 (Plaintiff's Exhibit 30 marked)</p> <p>7 BY MR. BOUCHARD:</p> <p>8 Q Mr. Shareef, this is Plaintiff's</p> <p>9 Exhibit 30, and it is NBI 624. I think this is the</p> <p>10 list of laborers at the United Inn that you may</p> <p>11 have been referring to before. Is this the list</p> <p>12 that you prepared of workers at the United Inn?</p> <p>13 A Yes.</p> <p>14 Q And is this a list that you prepared at</p> <p>15 counsel's request or a list that you already had in</p> <p>16 the files at United Inn?</p> <p>17 A No, I have these people.</p> <p>18 Q But this document itself with this list,</p> <p>19 did you type it up? I don't need to know what your</p> <p>20 lawyers talked to you about. But did you prepare</p> <p>21 this for this case?</p> <p>22 A I prepare for this, yes.</p> <p>23 Q There are a few names. So I looked</p> <p>24 through the discovery for W-2s and 1099s and that</p> <p>25 sort of things. Is it possible that some people on</p>


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<p style="text-align: right;">Page 396</p> <p>1 this list didn't get W-2s or 1099s?</p> <p>2 A Right.</p> <p>3 Q And do you know why that would be?</p> <p>4 A They just get cash.</p> <p>5 Q They just would get in some instances</p> <p>6 would just get cash?</p> <p>7 A Right.</p> <p>8 MR. BOUCHARD: Let's go off the record,</p> <p>9 please.</p> <p>10 THE VIDEOGRAPHER: Off the record at</p> <p>11 4:40 p.m.</p> <p>12 (Recess 4:40-4:50 p.m.)</p> <p>13 THE VIDEOGRAPHER: Back on the record at</p> <p>14 4:50 p.m.</p> <p>15 BY MR. BOUCHARD:</p> <p>16 Q Mr. Shareef, one question I wanted to ask</p> <p>17 that may simplify the questioning for Mr. Islam.</p> <p>18 You oversee security for the property at United Inn</p> <p>19 and Suites?</p> <p>20 A Yes.</p> <p>21 Q Is that your responsibility or his</p> <p>22 responsibility or a --</p> <p>23 A I can say --</p> <p>24 Q -- shared responsibility?</p> <p>25 A I can say 85 percent, 90 percent my</p>	<p style="text-align: right;">Page 398</p> <p>1 A Yes.</p> <p>2 Q And it says the meeting is for owners and</p> <p>3 general managers, right?</p> <p>4 A Correct.</p> <p>5 Q Is this consistent with your</p> <p>6 understanding, Mr. Shareef, of when the DeKalb</p> <p>7 County ordinance passed, December 2017 or</p> <p>8 thereabouts?</p> <p>9 A I think that was a different ordinance.</p> <p>10 This ordinance passed, they make it mandatory have</p> <p>11 no smoking in the DeKalb County hotels. That could</p> <p>12 be that one.</p> <p>13 (Plaintiff's Exhibit 32 marked)</p> <p>14 BY MR. BOUCHARD:</p> <p>15 Q This is Plaintiff's Exhibit 32 which is</p> <p>16 an attachment to Plaintiff's Exhibit 31, and it</p> <p>17 appears to be the ordinance itself. If you look</p> <p>18 back at Plaintiff's 31, your email, Plaintiff's</p> <p>19 Exhibit 31, you'll see that it says</p> <p>20 unitedinn4649@gmail --</p> <p>21 A Right.</p> <p>22 Q -- forwards the attachment to Tahir</p> <p>23 Shareef and this is that attachment,</p> <p>24 Plaintiff's 32. Is this familiar to you,</p> <p>25 Mr. Shareef?</p>
<p style="text-align: right;">Page 397</p> <p>1 responsibility.</p> <p>2 Q Was that true from 2017 to 2019?</p> <p>3 A Yes.</p> <p>4 Q I want to show you what I think is</p> <p>5 Plaintiff's Exhibit 30.</p> <p>6 A 30. I have 30.</p> <p>7 Q You have 30. 31.</p> <p>8 (Plaintiff's Exhibit 31 marked)</p> <p>9 BY MR. BOUCHARD:</p> <p>10 Q This is Plaintiff's Exhibit 31, and it is</p> <p>11 Bates stamped NBI 2682 to 83. And this is an email</p> <p>12 chain between you and Kathy Laity at Discover</p> <p>13 DeKalb. Do you see that?</p> <p>14 A Yes.</p> <p>15 Q And it looks like it relates to the</p> <p>16 DeKalb County Hotel Motel Extended Stay Ordinance.</p> <p>17 Is that right?</p> <p>18 A Yes.</p> <p>19 Q The date of Ms. Laity's email is</p> <p>20 December 1st, 2017. And she writes: The DeKalb</p> <p>21 County Hotel Motel Extended Stay Ordinance has now</p> <p>22 been signed and approved. We'll have a meeting on</p> <p>23 Wednesday, January 10th in our office to go over</p> <p>24 specifics.</p> <p>25 Do you see that?</p>	<p style="text-align: right;">Page 399</p> <p>1 A Yes.</p> <p>2 Q And when you said that you attended</p> <p>3 meetings with DeKalb County that in part discussed</p> <p>4 human trafficking and also the DeKalb County</p> <p>5 ordinance that had been passed, is this the</p> <p>6 ordinance that you were talking about?</p> <p>7 A I thought that is the earlier, but that's</p> <p>8 the time, yes.</p> <p>9 Q You believe that's --</p> <p>10 A Yeah. Yeah. I thought we attended early</p> <p>11 part of 2017. Because when they pass this 180-day</p> <p>12 ordinance, we have a meeting at that time before</p> <p>13 the passing of the ordinance. So it could be --</p> <p>14 the year is the same but I believe that's the early</p> <p>15 part of 2017 when before they pass the ordinance we</p> <p>16 had a meeting.</p> <p>17 Q Perhaps about a draft of the ordinance?</p> <p>18 A I think so. I think so.</p> <p>19 (Plaintiff's Exhibit 33 marked)</p> <p>20 BY MR. BOUCHARD:</p> <p>21 Q And then I'm showing you Plaintiff's 33</p> <p>22 which is an email -- it includes an email from</p> <p>23 Mr. Islam and actually is sent to you on</p> <p>24 January 30th, 2018 saying that we will be there</p> <p>25 tomorrow. It looks like he's talking about a</p>

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<p style="text-align: right;">Page 400</p> <p>1 meeting with Discover DeKalb about the new code 2 ordinances; is that correct? 3 A Yes. 4 Q Did you attend that meeting? 5 A I believe so. 6 Q Is that one of the meetings you're 7 thinking of you believe? 8 A Yeah. 9 Q Where they might have discussed the 10 ordinance? 11 A No. This is after they passed the 12 ordinance. I think this time ordinance has passed. 13 Q That's correct. And if you look down at 14 Ms. Laity's email, it says: This meeting is to 15 update everyone on current code enforcement and 16 fire regulations along with learning about the 17 DeKalb County Hotel and Extended Stay Ordinance -- 18 A Yeah, I think -- 19 Q -- requirements -- 20 A -- this time, yeah. 21 Q -- which become effective in March? 22 A Yes. Yes. 23 Q So is this one of the meetings that you 24 were thinking of you believe? 25 A Yes.</p>	<p style="text-align: right;">Page 402</p> <p>1 The following reporter and firm disclosures were presented by me at this proceeding for review 2 by counsel: 3 REPORTER DISCLOSURES 4 The following representations and disclosures are made in compliance with Georgia Law, more 5 specifically: Article 10 (B) of the Rules and Regulations of 6 the Board of Court Reporting (disclosure forms) OCGA Section 9-11-28 (c) (disqualification of 7 reporter for financial interest) OCGA Sections 15-14-37 (a) and (b) 8 (prohibitions against contracts except on a case-by-case basis). 9 - I am a certified court reporter in the State of 10 Georgia. - I am a subcontractor for Veritext Legal 11 Solutions. - I have been assigned to make a complete and 12 accurate record of these proceedings. - I have no relationship of interest in the matter 13 on which I am about to report which would disqualify me from making a verbatim record or 14 maintaining my obligation of impartiality in compliance with the Code of Professional Ethics. 15 - I have no direct contract with any party in this action, and my compensation is determined solely by 16 the terms of my subcontractor agreement. 17 FIRM DISCLOSURES 18 - Veritext Legal Solutions was contacted to provide reporting services by the noticing or taking 19 attorney in this matter. - There is no agreement in place that is prohibited 20 by OCGA 15-14-37 (a) and (b). Any case-specific discounts are automatically applied to all parties, 21 at such time as any party receives a discount. - Transcripts: The transcript of this proceeding 22 as produced will be a true, correct, and complete record of the colloquies, questions, and answers as 23 submitted by the certified court reporter. - Exhibits: No changes will be made to the 24 exhibits as submitted by the reporter, attorneys, or witnesses. 25</p>
<p style="text-align: right;">Page 401</p> <p>1 Q Where they apparently discussed -- 2 A They have this -- 3 Q -- human trafficking? 4 A Yeah. 5 MR. BOUCHARD: Thank you, Mr. Shareef. 6 THE WITNESS: You're welcome. 7 MR. BOUCHARD: That concludes my 8 questioning. 9 THE WITNESS: You're welcome. 10 THE VIDEOGRAPHER: We're off the record 11 at 4:58 p.m. 12 (Deposition concluded at 5:00 p.m.) 13 (Signature reserved) 14 15 16 17 18 19 20 21 22 23 24 25</p>	<p style="text-align: right;">Page 403</p> <p>1 - Password-Protected Access: Transcripts and exhibits relating to this proceeding will be 2 uploaded to a password-protected repository, to which all ordering parties will have access. 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25</p>

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<p style="text-align: right;">Page 404</p> <p>1 CERTIFICATE</p> <p>2 STATE OF GEORGIA:</p> <p>3 COUNTY OF FULTON:</p> <p>4 I hereby certify that the foregoing transcript</p> <p>5 was taken down to the best of my ability, as stated</p> <p>6 in the caption, and the colloquies, questions and</p> <p>7 answers were reduced to typewriting under my</p> <p>8 direction; that the transcript is a true and</p> <p>9 correct record of the evidence given upon said</p> <p>10 proceeding.</p> <p>11 I further certify that I am not a relative or</p> <p>12 employee or attorney of any party, nor am I</p> <p>13 financially interested in the outcome of this</p> <p>14 action.</p> <p>15 I have no relationship of interest in this</p> <p>16 matter which would disqualify me from maintaining</p> <p>17 my obligation of impartiality in compliance with</p> <p>18 the Code of Professional Ethics.</p> <p>19 I have no direct contract with any party in</p> <p>20 this action and my compensation is based solely on</p> <p>21 the terms of my subcontractor agreement.</p> <p>22 Nothing in the arrangements made for this</p> <p>23 proceeding impacts my absolute commitment to serve</p> <p>24 all parties as an impartial officer of the court.</p> <p>25 This the 10th day of May 2023.</p> <p>17 </p> <p>18 T. SHAREEF, Notary Public, Notary B-1401</p>	<p style="text-align: right;">Page 406</p> <p>1 ERRATA for ASSIGNMENT: ATL 5897010</p> <p>2 I, the undersigned, do hereby certify that I have</p> <p>3 read the transcript of my testimony, and that:</p> <p>4 ____ There are no changes noted.</p> <p>5 ____ The following changes are noted:</p> <p>6 Pursuant to Rule 30(7)(e) of the Federal Rules of</p> <p>7 Civil Procedure and/or OCGA 9-11-30(e), any changes</p> <p>8 in form or substance which you desire to make to</p> <p>9 your testimony shall be entered upon the deposition</p> <p>10 with a statement of the reasons given for making</p> <p>11 them. To assist you in making any such</p> <p>12 corrections, please use the form below. If</p> <p>13 additional pages are necessary, please furnish same</p> <p>14 and attach.</p> <p>15 Page ____ Line ____ Change ____</p> <p>16 Reason for change: _____</p> <p>17 Page ____ Line ____ Change ____</p> <p>18 Reason for change: _____</p> <p>19 Page ____ Line ____ Change ____</p> <p>20 Reason for change: _____</p> <p>21 Page ____ Line ____ Change ____</p> <p>22 Reason for change: _____</p> <p>23 Reason for change: _____</p> <p>24</p> <p>25</p>
<p style="text-align: right;">Page 405</p> <p>1 DEPOSITION ERRATA SHEET</p> <p>2 To: Dana Richens, Esq., drichens@sgrlaw.com</p> <p>3 Re: Signature of Deponent: Tahir Shareef</p> <p>4 Date Errata due back at our offices: 30 Days</p> <p>5</p> <p>6 Greetings:</p> <p>7</p> <p>8 This deposition has been requested for read and</p> <p>9 sign by the deponent. It is the deponent's</p> <p>10 responsibility to review the transcript, noting any</p> <p>11 changes or corrections on the attached PDF Errata.</p> <p>12 The deponent may fill out the Errata electronically</p> <p>13 or print and fill out manually.</p> <p>14</p> <p>15 Once the Errata is signed by the deponent and</p> <p>16 notarized, please email it to the offices of</p> <p>17 Veritext (below).</p> <p>18</p> <p>19 When the signed Errata is returned to us, we will</p> <p>20 seal and forward to the taking attorney to file</p> <p>21 with the original transcript. We will also send</p> <p>22 copies of the Errata to all ordering parties.</p> <p>23</p> <p>24 If the signed Errata is not returned within the</p> <p>25 time above, the original transcript may be filed</p> <p>with the court without the signature of the</p> <p>deponent.</p> <p>21</p> <p>22 Please send completed Errata to:</p> <p>23 Veritext Production Facility</p> <p>24 20 Mansell Court, Suite 300</p> <p>25 Roswell, GA 30076</p> <p>(770) 343-9696</p> <p>cs-southeast@veritext.com</p>	<p style="text-align: right;">Page 407</p> <p>1 Page ____ Line ____ Change ____</p> <p>2</p> <p>3 Reason for change: _____</p> <p>4 Page ____ Line ____ Change ____</p> <p>5</p> <p>6 Reason for change: _____</p> <p>7 Page ____ Line ____ Change ____</p> <p>8</p> <p>9 Reason for change: _____</p> <p>10 Page ____ Line ____ Change ____</p> <p>11</p> <p>12 Reason for change: _____</p> <p>13 Page ____ Line ____ Change ____</p> <p>14</p> <p>15 Reason for change: _____</p> <p>16 Page ____ Line ____ Change ____</p> <p>17</p> <p>18 Reason for change: _____</p> <p>19</p> <p>20 Deponent's Signature</p> <p>21 Sworn to and subscribed before me this ____ day of</p> <p>22 _____, _____.</p> <p>23</p> <p>24 Notary Public</p> <p>25 My Commission Expires: _____</p>

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Federal Rules of Civil Procedure

Rule 30

(e) Review By the Witness; Changes.

(1) Review; Statement of Changes. On request by the deponent or a party before the deposition is completed, the deponent must be allowed 30 days after being notified by the officer that the transcript or recording is available in which:

(A) to review the transcript or recording; and

(B) if there are changes in form or substance, to sign a statement listing the changes and the reasons for making them.

(2) Changes Indicated in the Officer's Certificate. The officer must note in the certificate prescribed by Rule 30(f)(1) whether a review was requested and, if so, must attach any changes the deponent makes during the 30-day period.

DISCLAIMER: THE FOREGOING FEDERAL PROCEDURE RULES ARE PROVIDED FOR INFORMATIONAL PURPOSES ONLY.

THE ABOVE RULES ARE CURRENT AS OF APRIL 1, 2019. PLEASE REFER TO THE APPLICABLE FEDERAL RULES OF CIVIL PROCEDURE FOR UP-TO-DATE INFORMATION.

VERITEXT LEGAL SOLUTIONS
COMPANY CERTIFICATE AND DISCLOSURE STATEMENT

Veritext Legal Solutions represents that the foregoing transcript is a true, correct and complete transcript of the colloquies, questions and answers as submitted by the court reporter. Veritext Legal Solutions further represents that the attached exhibits, if any, are true, correct and complete documents as submitted by the court reporter and/or attorneys in relation to this deposition and that the documents were processed in accordance with our litigation support and production standards.

Veritext Legal Solutions is committed to maintaining the confidentiality of client and witness information, in accordance with the regulations promulgated under the Health Insurance Portability and Accountability Act (HIPAA), as amended with respect to protected health information and the Gramm-Leach-Bliley Act, as amended, with respect to Personally Identifiable Information (PII). Physical transcripts and exhibits are managed under strict facility and personnel access controls. Electronic files of documents are stored in encrypted form and are transmitted in an encrypted fashion to authenticated parties who are permitted to access the material. Our data is hosted in a Tier 4 SSAE 16 certified facility.

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